

1

2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT

4 X-----X

5 JORDAN MANN,

6 Plaintiff,

7 -against-

8 PLUS ONE FITNESS, TRUMP WORLD TOWERS, "ROBERT"
9 DOE, JAMIE MACDONALD AND DOES 1-10 INCLUSIVE,

10 Defendants.

11 X-----X

12 120 Broadway

13 New York, New York

14 August 12, 2008

15 9:30 a.m.

16 EXAMINATION BEFORE TRIAL OF
17 the plaintiff, JORDAN MANN, held at the
18 above mentioned time and place, pursuant to
19 Order, before a Notary Public of the State
20 of New York.

21
22 **CONDENSED**
23
24
25

Page 2

1 2
 2 IT IS HEREBY STIPULATED AND AGREED by and
 3 between the attorneys for the respective parties
 4 hereto that objections to any questions, except
 5 as to the form of the question, are reserved for
 6 the Trial of this action.

7
 8 IT IS FURTHER STIPULATED AND AGREED that
 9 this deposition may be sworn to by the witness
 10 being examined before a Notary Public other than
 11 the Notary Public whom this examination was
 12 begun.

13
 14 IT IS FURTHER STIPULATED AND AGREED that the
 15 filing and certification of the original of the
 16 deposition is waived.

17
 18 IT IS FURTHER STIPULATED AND AGREED, that
 19 Counsel for the witness shall receive a free
 20 copy of this examination without charge.
 21
 22
 23
 24
 25

Page 3

2 APPEARANCES 3
 3 UWEM UMOH, ESQ.
 4 Attorney for Plaintiff
 5 255 Livingston Street
 6 Brooklyn, New York 11217
 7 (718) 360-0527

8
 9 DEBORAH MARTIN NORCROSS, ESQ.
 10 Attorney for Defendants
 11 Plus One Fitness and Jamie MacDonald
 12 60 Marion Road West
 13 Princeton, New Jersey 08540
 14 (609) 249-5860

15 LESTER, SCHWAB, KATZ & DWYER, LLP
 16 Attorneys for Defendant
 17 Trump World Towers
 18 120 Broadway
 19 New York, New York 10271
 20 BY: HAROLD DERSCHOWITZ, ESQ., of Counsel

21 ALSO PRESENT: HEATHER DAVIS
 22
 23
 24
 25

Page 4

1 4
 2 JORDAN MANN,
 3 the plaintiff herein, after having been
 4 first duly sworn by a Notary Public of the
 5 State of New York, was examined and
 6 testified as follows:

7 EXAMINATION BY
 8 MS. NORCROSS:

9 Q Please state your name for the
 10 record.

11 A Jordan Mann.

12 Q Please state your address for the
 13 record.

14 A 2137 Pitkin Avenue, Brooklyn,
 15 New York 11207.

16 Q Miss Mann, good morning. My name is
 17 Deborah Martin Norcross. I am an attorney
 18 representing Plus One Holdings, Incorporated and
 19 Jamie MacDonald.

20 Today is your deposition. I will be
 21 deposing you for a period of time; and then
 22 Mr. Derschowitz, who is representing Trump World
 23 Towers and John Henriques, will ask you some
 24 questions.

25 Those questions are going to be

Page 5

1 5
 2 pertaining to the claims you have raised from
 3 your complaint, in all of the versions of your
 4 complaint, as well as some background and other
 5 information.

6 A Okay.

7 Q Have you had your deposition taken
 8 before, ever?

9 A No, I have not.

10 Q Let me just go over a couple of the
 11 ground rules. I will ask you a series of
 12 questions. I will make them as singular and as
 13 simple as I can.

14 If there is any question I ask you
 15 that you don't hear, let me know that, and the
 16 court reporter will read the question back for
 17 you.

18 The court reporter is taking down
 19 everything that everybody says, which will be
 20 compiled in a transcript.

21 A Okay.

22 Q If there is any question I ask you
 23 that you don't understand, tell me that, and I
 24 will do my best to rephrase it so that you can,
 25 so that I am being as clear as I can be.

2 (Pages 2 to 5)

Page 6

1 6
 2 We need to be careful not to talk
 3 over one another.
 4 A Sure.
 5 Q Because the court reporter can only
 6 get one person down at a time.
 7 Objections to questions in a federal
 8 court deposition are very limited, for the most
 9 part. A defending attorney may only object to a
 10 question if it crosses over into what he
 11 believes is a privileged area.
 12 A Okay.
 13 Q Or if he has some kind of issue with
 14 the form of the question.
 15 A Okay.
 16 Q All other objections are reserved.
 17 However, in the course of
 18 depositions, attorneys do sometimes object.
 19 If your counsel objects, I would like
 20 you to not answer the question until we resolve
 21 the objection.
 22 A Okay.
 23 Q And then either he will direct you or
 24 I will direct you whether or not to answer.
 25 Are we good so far?

Page 7

2 7
 3 A Yes.
 4 Q Are you currently suffering from any
 5 medical condition that would in any way impair
 6 your ability to hear, understand and answer
 7 questions?
 8 A No.
 9 Q Are you taking any medication?
 10 A No.
 11 Q Let me finish the question, otherwise
 12 the transcript becomes unclear.
 13 You may realize what I am going to
 14 ask but that won't be clear on the transcript.
 15 A Okay.
 16 Q Are you taking any medication that
 17 would in any way impair your ability to hear,
 18 understand and answer questions?
 19 A No.
 20 Q What is your name?
 21 A Jordan Mann.
 22 Q Is that your complete name, or is
 23 there a middle name?
 24 A Middle name, Sudan.
 25 Q How long have you been known by that
 name?

Page 8

1 8
 2 A Legally, you mean?
 3 Q Legally.
 4 A I think it became legal in 2006.
 5 Q Do you remember when in 2006?
 6 A It had to be in the later part of
 7 2006, around there.
 8 Q Can you put a month to it?
 9 A Possibly November.
 10 Q Prior to the time that you changed
 11 your name -- and that was a name change; is that
 12 correct?
 13 A Yes.
 14 Q Prior to the time you changed your
 15 name to Jordan Sudan Mann, what was your name?
 16 A Rhonda Renee Mann.
 17 Q Is it accurate that you made an
 18 application to have your name changed, a legal
 19 application, legal papers?
 20 A Yes, I filed legal papers.
 21 Q And when did you do that?
 22 A It had to be, I believe, 2006.
 23 Q Did you have a lawyer to assist you
 24 in that process?
 25 A No.

Page 9

1 9
 2 Q You did that yourself?
 3 A Yes.
 4 Q Would it be accurate to say you did
 5 that in Hudson County, New Jersey?
 6 A Yes.
 7 Q Were you living in Hudson County,
 8 New Jersey at that time?
 9 A Yes.
 10 Q Why did you change your name?
 11 A Spiritual reasons.
 12 Q What are they?
 13 A Religious reasons.
 14 Q What were they?
 15 A Specifically?
 16 Q Yes, ma'am?
 17 A I had changed professions altogether.
 18 I was in the entertainment business
 19 before then. Then when I went to massage
 20 school, I totally changed my outlook on life and
 21 how to approach it and spiritual philosophy.
 22 That's why I changed it.
 23 Q What was it about the name Jordan
 24 Sudan Mann that met those spiritual reasons?
 25 A I just liked the two names. That's

3 (Pages 6 to 9)

Page 10

1 10
 2 why I chose them.
 3 Q Was your birth name Rhonda Renee
 4 Mann?
 5 A Yes.
 6 Q Have you ever been married?
 7 A No.
 8 Q Do you have any children?
 9 A No.
 10 Q Have you ever used a false name?
 11 A No.
 12 Q Have you ever signed a false name to
 13 a governmental document?
 14 A No.
 15 Q Have you ever signed a false name to
 16 an employment document?
 17 A No.
 18 MS. NORCROSS: Mark this as
 19 Defendant's Exhibit 1.
 20 (Whereupon the above referred
 21 to document was marked, Defendant's
 22 Exhibit 1, for identification, as of
 23 this date, by the reporter)
 24 Q I am handing you Defendant's
 25 Exhibit 1 to your deposition. I am going to ask

Page 11

1 11
 2 you to look it over.
 3 When you are done looking it over,
 4 let me know so I can ask you some questions,
 5 okay?
 6 A Okay.
 7 Q Can you identify that for me?
 8 A Yes. This is the -- it looks like
 9 it's a copy of the court judgment or paperwork
 10 that I used that shows that I changed my name
 11 legally.
 12 Q The printing on the first page of the
 13 document -- I mean the printing, because there
 14 is a stamp in the corner -- but the printing, is
 15 that your printing?
 16 A Yes.
 17 Q Look at the bottom of the first page
 18 of the document. Do you see the number 13?
 19 A Yes.
 20 Q Does that indicate that there are 12
 21 previous pages to this document?
 22 A No. I don't know where that 13 came
 23 from.
 24 Q When was the last time you saw this
 25 document?

Page 12

1 12
 2 A Actually, I keep it on me, because a
 3 lot of times back in the past, a lot of times,
 4 like my credit card records, I have to send it
 5 for them to change over the name. I keep it on
 6 me.
 7 Even with my college records and my
 8 massage certificate, it was in my former name.
 9 Q That would apply to any employment
 10 and medical records prior to the time you
 11 changed your name?
 12 A I don't understand the question.
 13 Q Any medical records that might exist
 14 pertaining to you that concern a period before
 15 November of 2006, those records would not be in
 16 the name of Jordan Mann, would they?
 17 A Actually, I don't know, to be honest
 18 with you.
 19 Q What was your legal accurate name
 20 before November 2006?
 21 A My legal name was Rhonda Renee Mann.
 22 I know I did research on the
 23 Internet, and I was talking to some people. And
 24 all my business associates and everyone knew me
 25 as Jordan.

Page 13

1 13
 2 There could be some promotional
 3 material.
 4 Q What about an official record, like a
 5 medical record? Would that be in your real name
 6 or another name?
 7 A To be honest, I would say it could be
 8 either or.
 9 Q On the top of this document, do you
 10 see the fax line?
 11 A Yes.
 12 Q Who is Patrick O'Keke, Esquire?
 13 A Patrick is one of the lawyers that I
 14 first contacted to handle my case.
 15 Q You mean this case?
 16 A Yes.
 17 Q Did Mr. O'Keke, did he assist you in
 18 the name change process, or no?
 19 A No, he did not.
 20 Q I am just trying to figure out what
 21 that fax line reflects, if anything.
 22 Where were you physically located on
 23 July 14, 2008?
 24 A Where was I living?
 25 Q Yes.

4 (Pages 10 to 13)

Page 14

1 14
 2 A I was staying in my sister's
 3 apartment in Harlem.
 4 Q On July 14, 2008, you were not in
 5 Guam?
 6 A Yes, I was.
 7 Q So did you fax this document to
 8 anybody on July 14, 2008?
 9 A I don't remember.
 10 I can check my records and find out,
 11 like my e-mail account, and let you know.
 12 Q We have some time tomorrow, so if you
 13 can do that?
 14 A Yes.
 15 Q Do you have in your possession -- not
 16 necessarily with you here today, but anywhere --
 17 do you have any other records other than these
 18 two pieces of paper pertaining to your name
 19 change application?
 20 A Well, I have a couple originals, like
 21 one is in storage, and one I keep on me. I know
 22 I have sent others out. I think I have two
 23 copies of that.
 24 Q They would be the same as the exhibit
 25 you have in front of you?

Page 15

1 15
 2 A I believe so.
 3 Q I am going to ask you to check that.
 4 I will tell you why. This may not be
 5 the case, but typically, when a document has the
 6 number 13 at the bottom, or any number at the
 7 bottom, that indicates page number. And if it's
 8 13, it's a rational conclusion there are pages 1
 9 through 12.
 10 I am going to ask you to check and
 11 see if you have any of those other pages, if
 12 they exist.
 13 A I only received two pages, total,
 14 from Jersey at that time.
 15 Q Did you file any papers with the
 16 court to effectuate this name change?
 17 A Yes. There is a series of procedures
 18 that you have to go through. And I just don't
 19 know how many pages I did in the beginning.
 20 I know this was the final form that
 21 they sent to me in the mail.
 22 Q Did you retain copies of the other
 23 papers you had to complete and send to the
 24 court?
 25 A No, I don't think so.

Page 16

1 16
 2 Once I got, like, the final, it did
 3 not make sense for me to keep it. I don't
 4 believe I did.
 5 Q Have you made any effort to look and
 6 determine whether you have any other papers
 7 pertaining to your name change?
 8 A I did not make any effort because I
 9 knew that it would seem out of character for me
 10 to hold onto paper. I always get a lot of
 11 paper, junk mail, so I would shred it.
 12 It did not mean anything because I
 13 had the final product.
 14 Q Did you shred these papers?
 15 A I don't know. I could have just
 16 ripped them up and thrown them in the garbage.
 17 Q Do you know that you discarded them,
 18 or you are not sure about that?
 19 A I am not sure, but I will check.
 20 Q And you have not made any effort up
 21 until now to check, would that be accurate?
 22 A Correct.
 23 MS. NORCROSS: Mark this as
 24 Defendant's Exhibit 2 and mark this
 25 as Defendant's Exhibit 3.

Page 17

1 17
 2 (Whereupon the above referred
 3 to documents were marked, Defendant's
 4 Exhibits 2 and 3, for identification,
 5 as of this date, by the reporter)
 6 Q Miss Mann, your name has never been
 7 Jordan Rhonda Mann; is that correct?
 8 A No. Sometimes people would make
 9 mistakes, and then sometimes it's like I will --
 10 well, people would put brackets. As long as it
 11 was the same social security.
 12 Q Do you know what a form W-4 is?
 13 A Yes.
 14 Q What is it?
 15 A It's a paper, your deductions.
 16 Q It's a government form, would that be
 17 accurate?
 18 A Yes.
 19 Q I am going to hand you what the
 20 reporter has marked Defendant's Exhibit 2 to
 21 your deposition. Look it over and tell me
 22 whether you can identify it, please.
 23 A Yes.
 24 Q What is that?
 25 A It's a W-4 form that I filled out.

5 (Pages 14 to 17)

Page 18

1 18
 2 Q And you filled it out, correct?
 3 A It looks like my handwriting.
 4 Q And you signed it at the bottom?
 5 A Yes, I did.
 6 Q What name did you use when you signed
 7 it?
 8 A I used Jordan.
 9 Q Jordan Mann, correct?
 10 A Yes.
 11 Q That was not your name in March of
 12 2006, was it?
 13 A That's what I went by.
 14 Q What was your legal name in March of
 15 2006?
 16 A My legal name was Rhonda Renee
 17 Mann.
 18 Q And not Jordan Rhonda Mann,
 19 correct?
 20 A Well, I was told by my accountant
 21 that I could use Jordan because it was operating
 22 as a business.
 23 Q Is it accurate to say this is a W-4
 24 form that you completed when you were employed
 25 by Plus One Fitness, Inc. or Plus One Holdings,

Page 19

2 19
 3 Inc.?
 4 A Yes, I am assuming so.
 5 Q And you were not employed by Plus One
 6 as a business, were you?
 7 A No.
 8 Q Okay, let me hand you Defendant's
 9 Exhibit 3 to your deposition.
 10 Take the time to look it over and
 11 identify it for me, if you can.
 12 A See, I am kind of curious. Why did I
 13 have to sign two forms?
 14 Q Before we get to that, take a look
 15 and just tell me whether you can identify that
 16 for me first, okay?
 17 A It looks like a W-2 form.
 18 Q W-2 or W-4?
 19 A W-4.
 20 Q Does that form bear your signature?
 21 A Yes.
 22 Q And what name did you sign on this
 23 W-4?
 24 A Jordan.
 25 Q Just Jordan?
 A Jordan Mann.

Page 20

1 20
 2 Q Actually Jordan Rhonda Mann; isn't
 3 that correct?
 4 A Well, you said what did I sign it
 5 as.
 6 Q Fair enough.
 7 The signature line says Jordan
 8 Mann?
 9 A Yes.
 10 Q The printing up at the top of the
 11 page, do you see the printing where it says
 12 Jordan Rhonda Mann?
 13 A Yes.
 14 Q Is that your printing?
 15 A Can I take a look at this really
 16 quick?
 17 Q Sure.
 18 MS. NORCROSS: Let the record
 19 reflect the witness is comparing
 20 Defendant's Exhibit 2 with
 21 Defendant's Exhibit 3.
 22 A On one of the forms, it does not look
 23 like I wrote Rhonda on this one. It does not
 24 look like my handwriting.
 25 Q On which?

Page 21

1 21
 2 A The one that was signed on
 3 March 14.
 4 Q You mean the signature line?
 5 A No. On line 1, where it says you
 6 have to put your first name and then your last
 7 name and social security.
 8 Q I am not sure I understand what you
 9 are saying.
 10 Let's take it in pieces. On line 1
 11 on Defendant's Exhibit 2, which is the March 14
 12 W-4 -- are you with me?
 13 A Yes.
 14 Q Line 1, the word Jordan, did you
 15 print that?
 16 A Yes, I did.
 17 Q The word Rhonda, did you print
 18 that?
 19 A It does not look like I did.
 20 Q The word Mann, did you print that?
 21 A Yes.
 22 Q Social security number on line 2, did
 23 you print that?
 24 A Yes, I did.
 25 Q The address, did you print that?

6 (Pages 18 to 21)

Page 22

1 22
 2 A Yes, I did.
 3 Q And the signature is your signature,
 4 correct?
 5 A Yes.
 6 Q And the date, 3-14-06, did you print
 7 that?
 8 A Yes.
 9 Q Look at Defendant's Exhibit 3.
 10 Again, same series of questions:
 11 Line 1, the word Jordan, did you print that?
 12 A Yes.
 13 Q Same line, the word Rhonda, did you
 14 print that?
 15 A Yes.
 16 Q The word Mann, did you print that?
 17 A Yes.
 18 Q The social security number, did you
 19 print that?
 20 A Yes.
 21 Q Did you print the address?
 22 A Yes.
 23 Q Did you insert the number of
 24 deductions -- or allowances, excuse me -- on
 25 line 5?

Page 23

1 23
 2 A Yes.
 3 Q The signature on that page is your
 4 signature?
 5 A Yes.
 6 Q And you wrote -- is it accurate you
 7 inserted the date 3-31-06?
 8 A Yes.
 9 Q On 3-31-06, your legal name was
 10 Rhonda Renee Mann, correct?
 11 A Yes.
 12 Q It was not Jordan Rhonda Mann,
 13 correct?
 14 A Correct.
 15 MS. NORCROSS: Mark this as
 16 Defendant's Exhibit 4, please.
 17 (Whereupon the above referred
 18 to document was marked, Defendant's
 19 Exhibit 4, for identification, as of
 20 this date, by the reporter)
 21 Q Miss Mann, I am handing you what the
 22 court reporter has marked as Defendant's
 23 Exhibit 4 to your deposition. Take your time
 24 and look it over, and then when you are
 25 finished, let me know whether you can identify

Page 24

1 24
 2 it, please.
 3 A Okay.
 4 Q Will you tell me what that is?
 5 A It looks like an internal posting
 6 application to be considered for another
 7 position within the company of Plus One.
 8 Q Did you complete the portion of this
 9 document under the section that says internal
 10 posting application to be completed by employee,
 11 the first two-thirds of the page?
 12 A Yes, I did.
 13 Q So the printing on that form is
 14 yours, correct?
 15 A Yes.
 16 Q And the date, where it says 2-15-06,
 17 you inserted that date; is that correct?
 18 A Yes.
 19 Q Over the signature line it says
 20 employee signature.
 21 Is that your signature?
 22 A Yes.
 23 Q What name did you sign?
 24 A Jordan Mann.
 25 Q That's the name you printed above,

Page 25

1 25
 2 where it says employee name?
 3 A Yes.
 4 Q In 2006, your legal name was not
 5 Jordan Mann, was it?
 6 A No.
 7 I am not too sure about that.
 8 Q You said your name was changed in
 9 November 2006, right?
 10 A I know in certain states there are --
 11 well, I am not a lawyer.
 12 Q Well, you had not received the court
 13 order that we have marked as Defendant's
 14 Exhibit 1 at the time you filled this -- you
 15 completed this internal posting application; is
 16 that right?
 17 A I had not received it yet.
 18 Q Had you filed it?
 19 A I don't know.
 20 I had been going back and forth with
 21 changing it. I really don't know the exact date
 22 when I started the whole thing.
 23 Q By the way, who is Jordan Thomas, if
 24 you know?
 25 A That's my e-mail address. I had an

7 (Pages 22 to 25)

Page 26

1 26
2 old e-mail address. That's not a person.
3 Q Do you know what the e-mail address
4 was that went with the name Jordan Thomas?
5 A It could have been
6 BuddhaChildOne@Yahoo.
7 A Or it could be my current one,
8 JordanSudan@Yahoo.com.
9 Q Concerning the address
10 JordanSudan@Yahoo.com, have you always used the
11 name Jordan Thomas to coincide with that
12 address?
13 A No.
14 Q Over what period of time did you use
15 Jordan Thomas?
16 A I don't know an exact answer.
17 I did not know how to change the
18 prompts and profiles.
19 Q Why did you use the name Jordan
20 Thomas?
21 A My grandfather.
22 Q What about your grandfather?
23 A His name is Thomas Jordan. I think
24 at the time when I got the e-mail address, I did
25 not want a lot of bulk mail or something like

Page 27

27
2 that. I did not want to put my personal
3 information.
4 I did not know how to use Yahoo at
5 the time.
6 Q Did you use either Rhonda Mann or
7 Jordan Mann prior to using Jordan Thomas for
8 e-mail purposes?
9 A I don't remember. I honestly don't
10 remember.
11 Q Did you make a deliberate decision to
12 stop using your name and use the name Jordan
13 Thomas for a period of time?
14 A I was not using the name Jordan
15 Thomas as introducing myself to people or
16 representing myself to people at all. I never
17 used that name.
18 MS. NORCROSS: Mark this as
19 Defendant's Exhibit 5.
20 (Whereupon the above referred
21 to document was marked, Defendant's
22 Exhibit 5, for identification, as of
23 this date, by the reporter)
24 Q Miss Mann, let me hand you what the
25 reporter has marked as Defendant's Exhibit 5.

Page 28

28
2 If you would please look it over, and
3 after you have had a chance to review it, tell
4 me whether or not you can identify it, okay?
5 A Okay. This looks like the first form
6 that I signed for the E.E.O.C.
7 Q This is the first paperwork that you
8 completed to begin your charge at the E.E.O.C.,
9 would that be right?
10 A Exactly.
11 Q Would you look at the last page of
12 the document, please?
13 A Okay.
14 Q I am correct, it's dated 4-5-06,
15 correct?
16 A Yes.
17 Q April 5, 2006?
18 A Yes.
19 Q Is that your signature next to where
20 it says signature?
21 A Yes.
22 MS. NORCROSS: Mark this as
23 Defendant's Exhibit 6.
24 (Whereupon the above referred
25 to document was marked, Defendant's

Page 29

29
2 Exhibit 6, for identification, as of
3 this date, by the reporter)
4 MS. NORCROSS: With everybody's
5 permission, I am going to staple the
6 last page of this document to
7 Exhibit 6.
8 MR. UMOH: That's fine.
9 Q Looking at page 6, at the bottom of
10 the page, where it says 4-5-06, and then below
11 that it says signature, is that your
12 signature?
13 A Yes, it is.
14 Q And did you print the name below the
15 signature, where it says print name?
16 A Yes.
17 Q And what name did you sign?
18 A Jordan Mann.
19 Q And your name had not been changed to
20 Jordan Mann in April of 2006, correct?
21 A No, it had not been.
22 Q And above the signature it says --
23 just tell me if I am quoting this correctly -- I
24 declare, certify, verify or state under penalty
25 of perjury that the foregoing is true and

8 (Pages 26 to 29)

Page 30

1 30
 2 correct, to my knowledge.
 3 Did I read that correctly?
 4 A Yes.
 5 Q You understood this was a government
 6 document when you signed it, correct?
 7 A I knew it was from the E.E.O.C.,
 8 yes.
 9 Q You understand the E.E.O.C. is a
 10 federal agency, correct?
 11 A Yes.
 12 Q Miss Mann, I am now handing you what
 13 the reporter has marked as Defendant's
 14 Exhibit 6.
 15 I am going to hand you Exhibit 6 and
 16 let you take the opportunity to review it,
 17 okay?
 18 A Okay.
 19 Q Have you had a chance to look over
 20 Exhibit 6?
 21 A Yes.
 22 Q Can you identify it?
 23 A It's the charge that I filed with the
 24 E.E.O.C.
 25 Q Can you tell from looking at this

Page 31

1 31
 2 document when you filed it?
 3 A It looks like they received it on
 4 August 3, 2006.
 5 Q Now is it accurate to say that you
 6 signed this document and had your signature
 7 notarized?
 8 A Does it call for a notary?
 9 Q Look at the bottom of the first page
 10 of the exhibit.
 11 A Okay. Then I must have had it
 12 notarized.
 13 Q Now, is it accurate that it was
 14 signed and notarized on August 1, 2006?
 15 A Yes.
 16 Q Where did you have this notarized?
 17 A I know it was in New York City, in
 18 Manhattan.
 19 Q Can you read the Notary Public's name
 20 in the document that was provided to us by your
 21 lawyer? It's obscured a bit.
 22 A One of the names, I can't see it off
 23 the copy, it looks like Mohinder.
 24 Q That's what it looks like to me, too.
 25 Do you know what the last name is?

Page 32

1 32
 2 A No. I can't make that out.
 3 Q Specifically where did you go to have
 4 this notarized?
 5 A I think it was somewhere on Broadway.
 6 It could have been like a stationery store.
 7 Q Is it accurate that you went to some
 8 business with which you were not otherwise
 9 familiar to get it notarized?
 10 A Correct.
 11 Q You did not have one of your lawyers
 12 notarize it for you?
 13 A No. I did it myself, had it
 14 notarized.
 15 Q Did the notary request that you
 16 provide him with identification of who you were
 17 before he or she notarized it?
 18 A I don't know. I don't know. I can't
 19 remember.
 20 Q What name did you use when you signed
 21 this document?
 22 A Jordan Mann.
 23 Q And on top of the second page, which
 24 bears Bates stamp number JM005, that's your
 25 signature in the upper right-hand corner?

Page 33

1 33
 2 A Yes.
 3 Q And on August 1, 2006, your name was
 4 still Rhonda Mann; is that right, legally?
 5 A Yes.
 6 Q Did you tell the notary that you were
 7 not using your correct legal name when you
 8 signed this?
 9 A I don't remember having any
 10 conversation. I just asked them to notarize it.
 11 MS. NORCROSS: Counsel, I am
 12 going to ask for a better copy, if
 13 you have one.
 14 MR. UMOH: I will take it
 15 under advisement.
 16 If I do have one, I will turn
 17 it over.
 18 Q Let me ask you one other question
 19 about this.
 20 A Sure.
 21 Q The signature appears on the first
 22 page of your typewritten statement; is that
 23 right?
 24 A Yes.
 25 Q Your signature and the notary stamp

9 (Pages 30 to 33)

Page 34

1 34
2 appears on the second page of this document
3 bearing bate stamp JM005; is that right?
4 A Did I write that?
5 Q That's where your signature is,
6 correct?
7 A Yes.
8 Q And that's where the notary stamp is,
9 too, correct?
10 A Yes.
11 Q Did that signature -- did you intend
12 for that signature to cover all three pages of
13 the statement that follow it?
14 A Yes.
15 Q So when you had this notarized, you
16 were basically saying that everything you wrote
17 in this whole document was true --
18 A Yes.
19 Q -- under penalty of perjury?
20 A Yes.
21 MS. NORCROSS: Mark this as
22 Defendant's Exhibit 7.
23 (Whereupon the above referred
24 to document was marked, Defendant's
25 Exhibit 7, for identification, as of

Page 35

1 35
2 this date, by the reporter)
3 Q Let me hand you what the reporter has
4 marked as Exhibit 7. And again, look it over,
5 and tell me if you can identify it, okay?
6 A Yes, I can identify it.
7 Q And what is this?
8 A It was a letter that I wrote to the
9 person who was handling my charge at the
10 E.E.O.C.
11 Q You wrote this letter?
12 A Yes.
13 Q And you signed it?
14 A Yes.
15 Q That's your signature at the bottom,
16 correct?
17 A Yes.
18 Q It's dated September 6, 2006,
19 correct?
20 A Yes.
21 Q And you signed it Jordan Mann,
22 correct?
23 A Yes.
24 Q And that was not your legal name at
25 the time, correct?

Page 36

1 36
2 A No.
3 Q No, it's not correct, or no, it was
4 not your name?
5 Is it correct that Jordan Mann was
6 not your legal name in September 2006?
7 A Correct.
8 Q Now is it accurate that in this
9 letter, you provided the E.E.O.C. with some
10 additional -- or with some witness
11 information?
12 A Witness information, I don't know
13 about witness information.
14 Let me read this.
15 Q Sure.
16 A I think I was just doing contact
17 information.
18 Q So you were giving your contact
19 information for whom?
20 A What do you mean, for whom?
21 For John Henriques and Thomas Pienkos
22 of Trump.
23 Q Is it accurate to say on September 6,
24 2006, you had contact information for John
25 Henriques?

Page 37

1 37
2 A Yes.
3 Q It's accurate on September 6, 2006,
4 you had contact information for Thomas
5 Pienkos?
6 A Yes.
7 Q If a document was provided in the
8 course of this case is saying you did not have
9 that contact information, that would be
10 inaccurate; is that true?
11 Do you want me to rephrase the
12 question?
13 A Yes.
14 Q I will rephrase it.
15 If Defendants were told that you did
16 not have contact information for Mr. Henriques
17 or Mr. Pienkos, that would not be a true
18 statement, because you did have that contact
19 information, correct?
20 A I am assuming this is correct,
21 because this is what I had when I was at Plus
22 One.
23 I don't know if it had changed or if
24 it's actually, you know, I was trying to
25 research and do the best to my ability.

10 (Pages 34 to 37)

Page 38

1 38
 2 Q To the best of your ability, this is
 3 the contact information for these two
 4 gentlemen?
 5 A Yes.
 6 Q You had that information in 2006,
 7 right?
 8 A Yes.
 9 Q So you would have had it after 2006,
 10 also, correct?
 11 A That would be hard to say.
 12 This could have been in storage.
 13 When I had to get out of my apartment, it was in
 14 storage, and I did not have access.
 15 Q Are there documents that remain in
 16 storage that may pertain to anything relating to
 17 this case, meaning your employment with Plus One
 18 or anything else you discussed in your
 19 complaint?
 20 A There could be. I have not gone
 21 through.
 22 I just got into town a few days ago.
 23 I have not been able to go all through myself.
 24 Q Were you aware documents were
 25 requested of you in January 2008?

Page 39

1 39
 2 A Specifically, what documents?
 3 Q Any documents?
 4 A 2008 of this year?
 5 Q Yes, ma'am.
 6 A I don't believe there is a request
 7 for anything.
 8 I mean, I would have to look at my
 9 e-mail account. I really have to check my
 10 e-mail account.
 11 Q At any time since you filed this
 12 complaint, did you make a search for documents
 13 that might have any bearing on the allegations
 14 you made in that complaint?
 15 A Did I make a search for documents?
 16 Q Yes, ma'am.
 17 A I am trying to think.
 18 Like what documents would I be
 19 searching for?
 20 Q Any documents.
 21 A Yes, taxes. I know taxes,
 22 definitely.
 23 Like my tax returns, I don't keep
 24 them for the last seven years, so I had to
 25 search for tax information, which was kind of

Page 40

1 40
 2 challenging.
 3 Q When did you make that search for
 4 your tax returns?
 5 A I don't know specific dates
 6 offhand.
 7 Q Give me the best approximation you
 8 can.
 9 A I can't even do that.
 10 Q Where were you living at the time?
 11 A September 6?
 12 Q No, when you were looking for your
 13 tax returns.
 14 Where were you living at the time you
 15 were looking for your tax returns?
 16 A Well, I would be able to let you
 17 know, if I knew when I was searching for the tax
 18 information.
 19 Q So where you were living is not going
 20 to help you?
 21 A Yes.
 22 Q Did you look for your tax returns
 23 before the complaint was filed?
 24 A Before I filed the E.E.O.C. charge?
 25 Q Sure, yes.

Page 41

1 41
 2 A No.
 3 Q Do you know when you filed your
 4 complaint in federal court?
 5 A No, I don't.
 6 Q Are you aware that you filed three
 7 different ones?
 8 A No.
 9 MS. NORCROSS: Mark this as
 10 Defendant's Exhibit 8.
 11 (Whereupon the above referred
 12 to document was marked, Defendant's
 13 Exhibit 8, for identification, as of
 14 this date, by the reporter)
 15 Q Miss Mann, let me hand you what Sandy
 16 has marked as Defendant's Exhibit 8. Take as
 17 much time as you need to look it over, because
 18 when you finish reviewing it, I am going to ask
 19 you if you can identify it, okay?
 20 A Okay.
 21 Q Have you ever seen this before?
 22 A Yes, I have.
 23 Q When did you see it for the first
 24 time, if you remember? You can approximate.
 25 A Looking at the date, it must have

11 (Pages 38 to 41)

Page 42

1 42
 2 been the summer of 2007.
 3 Q Do you know if you saw this before or
 4 after it was filed? Are you able to tell me
 5 that?
 6 A It must have been after.
 7 Q Let's say this was the summer of
 8 2007.
 9 At any time since the summer of 2007,
 10 up until today, have you made a search for any
 11 documents, including those that might be in
 12 storage that you referred to before, pertaining
 13 to this case?
 14 A Yes, I did make a search for
 15 documents.
 16 Q What documents did you search for,
 17 and when?
 18 A Again, I know definitely, my taxes.
 19 I know that was a stickler for me.
 20 In terms of specific documents, I
 21 would have to look at my e-mail to tell you
 22 which ones I was searching for. I don't know
 23 what is applicable or what is necessary.
 24 Whenever I talked to my lawyer, this
 25 is what he needs, you know.

Page 43

2 43
 3 Q Why is it you would have to look at
 4 your e-mail? Is that because that's where your
 5 communications with your counsel would be
 6 reflected?
 7 A Yes.
 8 Q Since you remember the tax returns,
 9 specifically, does this help you remember, at
 10 least generally, when you made the tax return
 11 search?
 12 A It would definitely have to be after
 13 June 21, 2007 up to this point. It would have
 14 to be after that.
 15 Q Let me ask you this. Let's see if we
 16 can get a finer time frame on it.
 17 A Okay.
 18 Q At some point, I don't want to get
 19 into privileged areas, but at some point you
 20 were asked to look for your tax returns; would
 21 that be right?
 22 A Yes.
 23 Q Do you remember what time of year
 24 that was; in other words, what season it was?
 25 Was it the summer, winter?
 A I don't remember what season it was.

Page 44

1 44
 2 I just remember the difficult time.
 3 I had to go back and forth and go to the I.R.S.
 4 It actually took me a long time to get the
 5 documents, because I was having issues with
 6 I.R.S. sending it to my P.O. box and them not
 7 sending it and rerouted it.
 8 Q Where were you living at the time
 9 when you were doing this back and forth with the
 10 I.R.S. to get your returns?
 11 A I know I was in New York City, but I
 12 don't know which address I was at when I was
 13 searching.
 14 Q Fair enough.
 15 But you had not gone to Guam yet,
 16 correct?
 17 A Correct.
 18 Q You said you had to look in storage.
 19 Where is that storage?
 20 A In Brooklyn.
 21 Q Is it a storage facility, somebody's
 22 house?
 23 A It's a storage facility.
 24 Q How long have you had that storage
 25 facility?

Page 45

1 45
 2 A Well, this most recent one, months.
 3 I mean, I can find out the actual
 4 day. I can call them and find out. I don't
 5 know exactly what month I did it, but it's been
 6 well over six months. It could be eight months.
 7 It could even be a year.
 8 Q Have you had different facilities?
 9 A Yes, I have had different facilities,
 10 yes.
 11 Now I have to remember how many
 12 storage places I had. At one time I was storing
 13 at someone's apartment, and then at a storage
 14 facility, then I had another storage facility.
 15 I can't say how long everything has been in
 16 storage.
 17 Q Okay.
 18 A I would say I have had my stuff in
 19 storage since sometime in 2006.
 20 Q Why did you put stuff in storage in
 21 2006?
 22 A I had to leave my apartment in 2006
 23 because I could not afford the rent anymore, and
 24 I had to move.
 25 Q I am going to skip ahead a little bit

12 (Pages 42 to 45)

Page 46

1 46
2 and let me ask a background question.
3 You have been working most recently
4 at a facility in Guam, correct?
5 A Correct.
6 Q And you traveled back to New York
7 recently, correct?
8 A Correct.
9 Q When did you get here? When did you
10 get back to New York?
11 A Last week, which was early morning --
12 you mean when did I land in J.F.K.?
13 Q When did you land?
14 A Tuesday, August 5.
15 Q You flew into J.F.K.?
16 A Yes.
17 Q Where did you fly from?
18 A The original departure?
19 Q Yes, ma'am.
20 A Guam.
21 Q Do you have a return flight?
22 A It's not a return flight, it's a one
23 way.
24 Q So if it was represented that you had
25 a return flight sometime after today, let's say,

Page 47

1 47
2 that would be an inaccurate statement; is that
3 right?
4 A I would not think it would be
5 inaccurate. It depends how you look at it.
6 Q You made a distinction that I am
7 following up on.
8 MR. UMOH: Allow the witness
9 to finish answering.
10 A Well, really, it's yes, I am going
11 back. I am not staying in New York.
12 With the one way, I phrase it like
13 that because of money purposes, because there is
14 restrictions on how you can change the ticket.
15 Q Are you scheduled to leave New York
16 this week?
17 A Yes.
18 Q When?
19 A Tomorrow.
20 Q What time?
21 A The flight leaves at 4:30 p.m.
22 Q And what airline?
23 A Air China.
24 Q And that's a flight to Singapore?
25 A Yes, final destination.

Page 48

1 48
2 Q So you are not going back to Guam?
3 A No.
4 Q So if someone were to describe --
5 A Well, initially it was like going
6 back to Guam, because of the --
7 MS. NORCROSS: Is there
8 something funny, Counsel?
9 MR. UMOH: Don't worry about
10 it. It's an inside joke.
11 A I was trying to get the cheapest
12 flight. I was trying to do the return back to
13 Guam to see if it was cheaper.
14 But it just turned out, I did not
15 know when I would be able to get out of my
16 contract where I was. I had to finagle it on
17 the Internet.
18 Q Your intention was to go tomorrow,
19 which is August 13, to go from New York to the
20 ultimate destination of Singapore; is that
21 correct?
22 A Yes. But originally, I thought I
23 would be able to come here early and get time
24 off from my massage gig in Guam, so I thought I
25 would be able to get out and at least take a

Page 49

1 49
2 week off.
3 But it was busy season, and then it
4 got closer and closer to the day. Now I had to
5 go straight to Singapore.
6 Q So you are going to Singapore
7 tomorrow, not Guam?
8 A Correct.
9 Q When did you book that flight?
10 A It had to be two weeks before
11 August 13.
12 I did it through the e-mail. I will
13 check my e-mail account.
14 Q Okay. If you can do that, that would
15 be good.
16 So you booked the flight about two
17 weeks ago, give or take?
18 A Yes.
19 Q At the time you booked the one, you
20 did it as two one-ways?
21 A Yes.
22 Q Because of the ticket pricing?
23 A Yes.
24 Q The first leg of that trip was from
25 Guam to New York?

13 (Pages 46 to 49)

Page 50

1 50
 2 A Yes.
 3 Q Did it stop in Japan?
 4 A Yes, in Japan and L.A.
 5 Q At the same time you booked that leg,
 6 you booked the second leg from New York
 7 ultimately to Singapore; is that right?
 8 A I did not purchase them on the same
 9 day. I was waiting for the price and checking
 10 it. No, I did not purchase it the same day.
 11 Q You purchased the first leg, and then
 12 a couple of days later, you purchased the second
 13 leg?
 14 A Yes.
 15 Q From the time you booked the second
 16 leg, have you made any effort to change the
 17 flight?
 18 A Yes. I called Air China, but then
 19 when I looked on my ticket, there are no
 20 changes, basically.
 21 Q When did you make that call?
 22 A It must have been very soon after I
 23 bought the ticket.
 24 Q Is there some way you can check
 25 that?

Page 51

1 51
 2 A I did not use a cell phone.
 3 All I know, it was soon after. It
 4 had to have been at least two weeks before the
 5 13th.
 6 Q Let me see if I can narrow it down.
 7 About two weeks ago, give or take,
 8 you booked a one-way ticket from Guam through
 9 other airports to J.F.K., correct?
 10 A More than two weeks for the one
 11 coming to J.F.K.
 12 Q A couple of days later, you booked
 13 another one-way flight, originating in New York,
 14 with an ultimate destination in Singapore; is
 15 that right?
 16 A Not a couple of days later. It could
 17 have been maybe two weeks later.
 18 Q Let's try it a different way.
 19 A Okay.
 20 Q Starting with today as your reference
 21 point, how long ago did you book the flight to
 22 Singapore?
 23 A Backtracking from August 13, within
 24 the last two weeks.
 25 Q Is that because you have to use it to

Page 52

1 52
 2 get a two-weeks advance fare?
 3 A Yes.
 4 Q You booked an Air China flight with
 5 the ultimate destination of Singapore?
 6 A Yes.
 7 Q Then at some point you called to see
 8 if you could change that flight; is that
 9 correct?
 10 A I know I called the priceline 800
 11 number. Then I looked on their terms and
 12 conditions and agreements, and it says it was
 13 nonnegotiable, you could not change it.
 14 Q Did you actually talk to someone at
 15 priceline about changing it, or not?
 16 A No, I don't think I talked to anyone
 17 at priceline.
 18 I know I talked to someone at Air
 19 China. But talking to someone at priceline, I
 20 don't remember.
 21 Q You said you called the priceline 800
 22 number.
 23 Did you actually talk to anybody
 24 there?
 25 A I could have, but I know I did not

Page 53

1 53
 2 get the result that I wanted.
 3 Q You did not get the result you wanted
 4 from Air China either, correct?
 5 A Correct.
 6 Q About when did you make those calls?
 7 You can time it one of two ways: How long ago,
 8 starting with today, or how long after you made
 9 your original flight reservations.
 10 A When I called to see if I could
 11 change it, it must have been a few days or even
 12 a day or couple of days that I called to see if
 13 I could change it.
 14 Q Why did you call to see if you could
 15 change it? I am not asking you to review the
 16 content of the discussions you may have had with
 17 your lawyer, because those are privileged.
 18 MR. UMOH: I object to the
 19 question to the extent it touches on
 20 any discussions.
 21 MS. NORCROSS: I already said
 22 that, Counsel.
 23 Q Why did you try to change your
 24 flight?
 25 A Am I supposed to answer that?

14 (Pages 50 to 53)

Page 54

54

1
2 Q Yes, ma'am.
3 A To try and make accommodations to be
4 available for the deposition.
5 Q Other than the one time that you
6 talked to Air China within a couple, few days
7 after you originally booked the ticket, have you
8 made any other efforts to change your flight?
9 A Well, I was trying to get a
10 different -- I was trying to actually get a
11 refund off of -- I was trying to get a refund
12 off my first one-way ticket, and I was trying to
13 buy the multi destination ticket with miles. I
14 was going to be able to change the dates, but it
15 did not come through in time.
16 Q I am talking about the return flight
17 now.
18 A But I already bought the first leg.
19 Then I bought the second leg.
20 When I was trying to change the
21 dates, I went on the Internet, he was giving me
22 a good price, for a multi destination.
23 Q I see.
24 When was the last time you made any
25 effort to change your flight arrangements?

Page 55

55

2 A It must have been the last day I left
3 Guam. It was August 5 in Guam when I left.
4 Q Is it accurate you could have changed
5 your flights, but it would have cost money? In
6 other words, the flights were available, it was
7 just the cost of it that caused you not to
8 change your flights; is that accurate?
9 A Well, even when I was -- like my
10 first one way, I called American, and they said
11 nothing was available. I could not believe it,
12 that nothing was available. I was just going
13 with the ticket that I already bought. I was
14 sort of waiting closer to the day for this guy
15 on the Internet to get back to me.
16 Q But the leg between New York and
17 Singapore, you could have taken that flight if
18 you were willing to pay the extra fare?
19 A I bought that through priceline.
20 Q You could have changed it, but you
21 would have had to buy a new ticket; is that
22 right?
23 A Well, technically, it's not changing.
24 Technically, it's like buying a whole other
25 ticket.

Page 56

56

1
2 Q But you could have done that,
3 correct?
4 MR. UMOH: Objection.
5 Q You did not look into that?
6 MR. UMOH: Objection.
7 MS. NORCROSS: What is the
8 basis of the objection?
9 MR. UMOH: That's not a
10 question. That's a statement.
11 Q Is it accurate that you did not look
12 into booking a new flight to Singapore?
13 A But, I did. I was going through this
14 guy who had a travel company.
15 Q When did you determine finally that
16 you were not going to be able to change your
17 flight to Singapore?
18 A I literally was waiting up to the day
19 I left. The guy never got back to me.
20 Q By August 5 in Guam, which I guess
21 would be the 4th here, you knew you were not
22 going to be able to change your flight, would
23 that be accurate?
24 A Up until that point, I knew I had not
25 changed it.

Page 57

57

1
2 Q My question is, you had determined,
3 before you got on the plane to come to New York,
4 you had determined you were not going to be able
5 to change your flights, either coming to
6 New York or leaving New York tomorrow?
7 MR. UMOH: Objection as to
8 form.
9 Q Is that correct?
10 A Well, the way you're phrasing it, you
11 are saying I was determined not to change my
12 flight.
13 Q No, I am sorry. I am not trying to
14 give that impression.
15 All I am trying to do is figure out
16 when you stopped making any effort to change
17 your flight. I just want to know when you took
18 the last step to see whether you can change your
19 flights.
20 A The last time I looked into it was
21 definitely before I boarded the plane.
22 Q On the 5th, Guam time; is that
23 right?
24 A I am sorry. What was the question?
25 Q I am trying to figure out when it was

15 (Pages 54 to 57)

Page 58

1 58
2 you came to the conclusion that you were not
3 going to be able to change your flight and
4 therefore stopped making any further effort to
5 do it.

6 MR. UMOH: Objection.

7 A Well, it's like you are saying that I
8 have stopped.

9 I never stopped. I have not been
10 able to. I think that's what I am trying to
11 say.

12 Q That's fair enough.

13 Let me try to clarify it.

14 When was the last time you took any
15 step to change your flight to Singapore, the
16 timing of your flight to Singapore? Does that
17 help?

18 A Well, if I am e-mailing people --
19 well, I don't know a specific date.

20 Q My effort is to try to find out when
21 you took the last step.

22 In other words, if you decided you
23 are not going to be able to do it, and decided
24 not to take any further steps to try to do it,
25 then there is nothing wrong with that. I just

Page 59

2 59
3 want to know when that was.

4 Again, the question is, when was the
5 last time you took any step or any action to try
6 to change your flight to Singapore?

7 A Well, I was trying to ask my father
8 for money. I don't have money.

9 Right now, it's going to cost
10 thousands of dollars. I don't have that
11 money.

12 Q I am just trying to figure out when,
13 not why.

14 A Last week.

15 Q Last week?

16 A Yes.

17 Q By last week, do you mean after you
18 arrived in New York?

19 A Yes.

20 Q Tell me everything -- tell me each
21 thing you did to try to change your flights last
22 week.

23 A I did not call priceline. They
24 already said I could not change it.

25 Q So then what did you do?

A Internet search.

Page 60

1 60
2 Q And what did you search on the
3 Internet?

4 A It's Craigslist.

5 Q Were you trying to trade your
6 ticket?

7 A I did not even know I could do that.
8 It never occurred to me to trade a ticket.

9 It was just sort of buying miles,
10 which is cheaper, from someone who had miles.

11 Q Why were you doing that if the ticket
12 you already purchased was nonchangeable and
13 nonrefundable?

14 A I was doing that because it still
15 would have been cheaper.

16 And I felt nervous because if I was
17 not able to be here, it would negatively impact
18 my case.

19 Q So you searched on the Internet.
20 Did you come up with anything?

21 A No, nothing that I thought was
22 legitimate. Throughout my whole search, you
23 know, or else I would have had my ticket.

24 MR. UMOH: Off the record.
25 (Discussion off the record)

Page 61

1 61
2 Q Do you have any of the documents
3 pertaining to your tickets? By documents, I
4 mean things like confirming e-mails, receipts
5 for the tickets, any documents pertaining to
6 these flights?

7 A E-mail confirmation.

8 Q Did you use any E-ticket coming into
9 New York?

10 A Yes.

11 Q Do you have any portion of that
12 E-ticket?

13 A Yes, I do.

14 Q This likely will continue tomorrow
15 morning, so I am going to ask you to bring those
16 documents with you, okay?

17 A Okay.

18 MS. NORCROSS: Let's take a
19 short break.

20 (Discussion off the record)

21 Q Miss Mann, did you know your
22 deposition was noticed in January, February?

23 A Yes, I think I remember the talk of
24 deposition around 2008.

25 I don't know the dates when it was

16 (Pages 58 to 61)

Page 62

1 62
2 supposed to take place. I don't remember.
3 Q But earlier this year -- and by that
4 I mean, January, February time frame -- you knew
5 that your deposition had been noticed or
6 scheduled by us?
7 A I knew I would have to do it
8 sometime, but I did not know -- I don't remember
9 the dates. I knew eventually I would have to do
10 it.
11 Q Where was your most Recent
12 employment, if any?
13 A In Guam.
14 Q What is the name of your employer?
15 A Former employer is P.I.C. Resort.
16 Q When you say former employer, have
17 you terminated your employment with the P.I.C.
18 Resort?
19 A Yes, I have.
20 Q What were the circumstances under
21 which your employment terminated?
22 A By contract, I had to give them
23 30 days notice.
24 Q When did you give them 30 days
25 notice?

Page 63

2 63
3 A It had to have been either July 5th
4 or July 4th, one of those days.
5 Q Was that notice in writing?
6 A Yes, it was.
7 Q And do you have a copy of that
8 notice?
9 A Not with me.
10 Q Where is it?
11 A I can get a copy. I sent it via
12 e-mail.
13 Q Do you have access to your e-mail
14 while you're in New York?
15 A Yes.
16 Q Can you bring it tomorrow?
17 A Yes.
18 Q Is it accurate to say you resigned
19 from your employment at the P.I.C. Resort?
20 A I think it's more accurate to say I
21 terminated the agreement.
22 Q Okay. Is it right that you
23 terminated voluntarily? You made the decision
24 to terminate?
25 A Yes.
Q And why did you decide to terminate

Page 64

1 64
2 your employment at the P.I.C. Resort?
3 A Well, I knew I had to be here in
4 person for a deposition.
5 Q And that's why you terminated?
6 A That was the first reason, yes.
7 Q You said you terminated 30 days ago,
8 correct?
9 A Yes.
10 Q Is there any other reason why you
11 terminated? Again, when I say terminated, I
12 mean terminated your employment with the P.I.C.
13 Resort.
14 A No. I was in good standing with the
15 company.
16 Q Did you submit an application to
17 attend an educational program?
18 A Yes, I did.
19 Q And when did you submit that
20 application?
21 A For education?
22 Q Yes, ma'am.
23 A It had to have been sometime at the
24 end of February. Yes, end of February or early
25 March.

Page 65

1 65
2 Q Tell me how you obtained your
3 position at the P.I.C. Resort.
4 A I found a job listing through
5 Craigslist, and I answered an ad via e-mail, and
6 I had a phone interview, and they hired me.
7 Q Can you identify with any level of
8 detail the Craigslist listing to which you
9 responded?
10 A Like what did it say?
11 Q What did it say, who was it to, what
12 was the job number?
13 A I don't remember the job number.
14 Usually Craigslist is anonymous when
15 you respond.
16 But from what I recall, it was about
17 a new venture of a healing center, spa, looking
18 for a certified massage therapist.
19 Q And when was that?
20 A Even though I got hired in February,
21 I had contacted them months before, but there
22 were no positions.
23 And then, just following up again, I
24 made contact with them, I believe it was
25 February.

17 (Pages 62 to 65)

Page 66

1 66
2 Q February 2008; is that right?
3 A February 2008, or it could have been
4 January.
5 I am thinking about when I actually
6 bought my ticket and when I was on the interview
7 on the phone; so January, February.
8 Q Now you had a phone interview.
9 Did they call you, or did you call
10 them?
11 A Both.
12 Q You had more than one interview; is
13 that right?
14 A Correct.
15 Q When was the first interview?
16 A It had to be either January or
17 February.
18 Q And in the first interview, did they
19 call you, or did you call them?
20 A I am trying to think. I reached out
21 to them first, and then they called me right
22 back. It went straight to voice mail. So it
23 was they first and then me.
24 Q Did these calls occur to and from a
25 cell phone or from a land line?

Page 67

1 67
2 A The one that went straight to voice
3 mail, that was my cell phone. But there was no
4 record, because my cell phone was off.
5 Then I called them from a land
6 line.
7 Q Are there any documents that you can
8 think of that would pinpoint more accurately
9 when those phone calls took place?
10 A I could check my e-mail.
11 Q Do you have e-mail going directly to
12 and from the P.I.C. Resort?
13 A Yes, I have e-mailed them directly.
14 Q I will tell you, none of those
15 e-mails have been produced, although they have
16 been requested.
17 I will ask you to bring those also
18 tomorrow.
19 MR. UMOH: I will take it
20 under advisement.
21 Q I am going to ask you to look for
22 them, okay? If your lawyer tells you not to
23 produce them, we will have to deal with that.
24 A Is it regarding my employment, or
25 corresponding back on a personnel level, or are

Page 68

1 68
2 you talking about employment only?
3 Q It's hard for me to answer that,
4 since I can't see them.
5 Basically what I am looking for
6 regarding this specific thing -- right now, what
7 I am talking about are any e-mails between you
8 and anybody at the P.I.C. Resort regarding your
9 interview, your employment, your decision to
10 leave, anything regarding your employment.
11 A Okay.
12 Q The P.I.C. Resort offered you a job;
13 is that right?
14 A Yes.
15 Q Did they do that on the phone, in
16 person, by e-mail, or by some other means?
17 A Over the phone.
18 Q Do you remember when that was?
19 A It had to have been February.
20 Q Why did it have to be February?
21 A Well, it was either late January or
22 early February, because I remember I did not
23 have enough -- like I was the last one. I had
24 to leave in like two weeks, like pack up and go.
25 It had to be February.

Page 69

1 69
2 Q What do you mean, you were the last
3 one?
4 A Someone ended up not going. They
5 needed one more person, so I was the last person
6 hired.
7 MS. NORCROSS: Mark this as
8 Defendant's Exhibit 9.
9 (Whereupon the above referred
10 to document was marked, Defendant's
11 Exhibit 9, for identification, as of
12 this date, by the reporter)
13 Q Miss Mann, I am going to hand you
14 what has been marked as Exhibit 9.
15 Look it over, and then after you have
16 done that, tell me whether you can identify it,
17 okay?
18 A Sure. Okay.
19 Q Can you tell me what Defendant's
20 Exhibit 9 is?
21 A Yes. It is a letter from New York
22 University saying that I have been accepted into
23 an educational program.
24 Q When did you apply for this
25 program?

18 (Pages 66 to 69)

Page 70

1 70
 2 MR. UMOH: Objection. Asked
 3 and answered.
 4 MS. NORCROSS: No, actually,
 5 it has not been.
 6 Q Now that you have the document, does
 7 that help you identify when you applied?
 8 MR. UMOH: Objection.
 9 A I did tell you earlier.
 10 Q Tell me again.
 11 A I already told you earlier.
 12 Q Well, you can tell me again.
 13 A Okay.
 14 Q I will ask a different question.
 15 Did you apply for the Tisch Program
 16 before or after you accepted the employment at
 17 the P.I.C. Resort?
 18 A That's a good question. I don't
 19 know, because it was all around the same time,
 20 like everything was shifting all at the same
 21 time. I don't know offhand. It was very, very
 22 close.
 23 Q Let's see if we can bring it a little
 24 bit closer.
 25 Do you recall whether, when you

Page 71

2 71
 3 interviewed with the P.I.C. Resort, whether you
 4 told them that you were applying to an
 5 educational program?
 6 A No. I did not tell them I was
 7 applying, no.
 8 Q At the time you interviewed with the
 9 P.I.C. Resort, had you made the decision to
 10 apply to this N.Y.U. program?
 11 A I know I was definitely contemplating
 12 it.
 13 Q But do you know if you made a
 14 decision?
 15 A I don't know if I submitted documents
 16 or anything like that. I don't know the exact
 17 dates. I would have to go back and research.
 18 MS. NORCROSS: Mark this as
 19 Defendant's Exhibit 10.
 20 (Whereupon the above referred
 21 to document was marked, Defendant's
 22 Exhibit 10, for identification, as of
 23 this date, by the reporter)
 24 Q Miss Mann, let me hand you what the
 25 reporter has marked as Exhibit 10, and ask you
 to again look it over. And then when you have

Page 72

1 72
 2 finished looking it over, tell me whether you
 3 can identify it.
 4 A Yes, I can identify it.
 5 Q What is this?
 6 A This is my employment agreement that
 7 I signed with my former employer.
 8 Q Is it your testimony that the P.I.C.
 9 Resort did not terminate the agreement or fire
 10 you or anything like that?
 11 A Correct.
 12 Q The termination of this agreement was
 13 entirely voluntary, by you?
 14 A Yes.
 15 Q Do you have employment in Singapore?
 16 Do you have a job lined up?
 17 A No.
 18 Q Miss Mann, had you decided to
 19 terminate your employment with the P.I.C. Resort
 20 in June of 2008? Had you made that decision?
 21 A No, not to terminate. No, not in
 22 June. No, that would not make sense. There
 23 would be no way I would think about terminating.
 24 I knew I had to come back here
 25 eventually, in person, but I did not want to

Page 73

1 73
 2 terminate my agreement.
 3 Q You knew in April of 2008 that you
 4 had been accepted at the N.Y.U. program in
 5 Singapore, correct?
 6 A That's different. I did not know
 7 whether I would get the funding to actually
 8 go.
 9 Q Please just answer my question.
 10 My question was, by April 2008, you
 11 knew you had been accepted into that program in
 12 Singapore?
 13 A Yes.
 14 Q You applied for that program, we
 15 already established, sometime before April of
 16 2008, correct?
 17 A Yes.
 18 Q Now you mentioned funding. What
 19 funding are you referring to?
 20 A Tuition is very expensive. Sometimes
 21 how the interest rates go, you know, I did not
 22 know whether or not I would get a scholarship
 23 and have money for housing when I moved there.
 24 That was the whole thing. It was sort of like a
 25 money issue, would I be able to afford it.

19 (Pages 70 to 73)

Page 74

1 74
2 Q What did you do to resolve that money
3 issue?

4 MR. UMOH: Objection, but you
5 can answer.

6 Q You can answer.

7 A I tried to apply for as many
8 scholarships as possible. Of course, applying
9 for grants.

10 Q Over what period of time did you make
11 these applications?

12 A Well, I know it must have been at
13 least after April 10, because when I found out I
14 got accepted, I was like, okay, how am I going
15 to pay for it?

16 I know I applied for some
17 scholarships.

18 Q What scholarships did you apply
19 for?

20 A I am trying to think. Like various
21 foundations, I would send inquiry letters. I
22 don't know the exact names, but I have them
23 written down.

24 Q Where do you have them written
25 down?

Page 75

1 75
2 A On my computer.

3 Q Do you have that computer in New York
4 with you? I don't mean in this room.

5 A Yes, I do.

6 Q I am going to ask you to produce
7 those tomorrow, too?

8 MR. UMOH: Take it under
9 advisement.

10 MS. NORCROSS: I don't know
11 what that means, take it under
12 advisement.

13 Only judges can take it under
14 advisement.

15 Q Did you obtain any scholarship
16 foundation or grant money?

17 A I know Tisch gave me money, the
18 school. I have not heard back from any other
19 places.

20 Q How much money did Tisch give you?

21 A You are talking per year?

22 A Yes.

23 It's not a lot. It's only 6,000.

24 Q Even though these financial issues
25 have not been resolved, you are still going,

Page 76

1 76
2 correct?

3 A Right now, that's what I have to
4 clear up with the bursar's office, just to make
5 sure.

6 Q Well, you already booked your flight,
7 correct?

8 A Yes, definitely.

9 Basically, my account is current. I
10 have to make sure. Like when you get there, you
11 have to sign papers, promissory notes for them
12 to release the funds.

13 Q Are you saying the only thing you
14 need to do is sign papers when you get to
15 Singapore?

16 A Exactly.

17 MS. NORCROSS: Mark this as
18 Defendant's Exhibit 11.

19 (Whereupon the above referred
20 to document was marked, Defendant's
21 Exhibit 11, for identification, as of
22 this date, by the reporter)

23 Q Miss Mann, take a look at what Sandy
24 has marked as Exhibit 11.

25 Again, look it over. And when you

Page 77

1 77
2 are finished, you can identify it.

3 A Yes, this is something I got
4 notarized while I was in Guam.

5 Q Did you write this?

6 A Under the advisement of my lawyer.

7 Q Did you sign it?

8 A Yes, I did.

9 Q And you signed it and had it
10 notarized, correct?

11 A Yes, I did.

12 Q Did you read it before you signed
13 it?

14 A Yes.

15 Q Okay. Just one other question.

16 At the time you signed Exhibit 11,
17 you knew you had been accepted into the Tisch
18 program, correct?

19 A Yes.

20 Q And you therefore knew you were going
21 to be terminating your employment with the
22 P.I.C. Resort; is that correct?

23 A Eventually, yes.

24 MS. NORCROSS: Off the record.
25 (Whereupon a lunch break was taken)

20 (Pages 74 to 77)

Page 78

1 78
2 MS. NORCROSS: Mark this as
3 Defendant's Exhibit 12.
4 (Whereupon the above referred
5 to document was marked, Defendant's
6 Exhibit 12, for identification, as of
7 this date, by the reporter)
8 Q Miss Mann, you are reviewing what the
9 reporter has marked as Exhibit 12 to your
10 deposition.
11 A Yes.
12 Q When you have had a chance to look
13 that over, let me know, and tell me if you can
14 identify it.
15 A Yes, I can identify it.
16 These are my pay stubs from my last
17 job.
18 Q When you say your last job, you
19 mean?
20 A From P.I.C.
21 Q Now look through them.
22 What I would like you to do is tell
23 me if these pay stubs reflect all of the monies
24 you have earned, whether they reflect all of the
25 money you earned while you were employed by the

Page 79

1 79
2 Pacific Island Club in Guam.
3 A These only reflect credit card tips.
4 It does not reflect the cash tips. That's the
5 only difference.
6 Q Do these documents cover every pay
7 period that you worked for the --
8 A Yes, every pay period.
9 Q Is it accurate that these documents
10 reflect all of the money you were paid, other
11 than cash tips?
12 A Correct.
13 Q What, if any, records do you have
14 that reflect the cash tips that you received?
15 A I don't have records of cash tips.
16 Q Did you keep track of them?
17 A No.
18 Q How do you intend to report them on
19 your next tax filing?
20 A It's sort of like I do an estimate.
21 I know basically, at the resort, the
22 Korean and Japanese culture, their custom is not
23 to tip. Luckily, it would be a dollar or three
24 a week. I knew there would be no way that I
25 would inaccurately reflect under than what I got

Page 80

1 80
2 paid in terms of cash tips.
3 At the resort, it's customary where
4 you don't get tips.
5 The only tips reflected here are
6 American tips.
7 Q You did receive cash tips in addition
8 to whatever is reflected on Defendant's
9 Exhibit 12?
10 A Yes.
11 Q In any of your prior jobs -- I am
12 going to get to your employment history, but let
13 me ask you this now.
14 In any of your prior jobs, did you
15 receive cash tips?
16 A Yes.
17 Q And in any of those prior jobs, did
18 you keep detailed records of the cash tips you
19 received?
20 A My accountant helped me do all that.
21 Yes, I must have. I remember me
22 claiming cash on certain tax returns, so yes.
23 Q I am sorry?
24 A I did not answer directly.
25 Q Exactly.

Page 81

1 81
2 A What is the question?
3 Q The question is, in any position
4 previous to the Pacific Island Club, did you
5 keep records reflecting cash tips you
6 received?
7 A Yes, I did.
8 Q Where are those records today, do you
9 know?
10 A I am assuming -- I would only keep
11 the receipts and everything. I think it's up to
12 three years, my tax return. Seven years back I
13 would not have kept them.
14 However long you're supposed to keep
15 your tax returns, I would have them. I am sure
16 they are in storage.
17 Q In the storage that you talked about
18 earlier today?
19 A Yes.
20 Q Documents reflecting your earnings
21 have been requested a long time ago, so I am
22 going to ask you to search for those documents
23 and produce them.
24 A I apologize.
25 When I was moving, I had storage for

21 (Pages 78 to 81)

Page 82

1 82
2 well over a year, and I tried to give them as
3 soon as possible. I know I gave stuff to my
4 attorney in piecemeal. The only reason why I
5 remember the tax things is because that was the
6 most difficult that I had to go back and forth
7 with.

8 MS. NORCROSS: Mark this as
9 Defendant's Exhibit 13.

10 (Whereupon the above referred
11 to document was marked, Defendant's
12 Exhibit 13, for identification, as of
13 this date, by the reporter)

14 MS. NORCROSS: I will get
15 copies of this made for everybody
16 later.

17 Q Miss Mann, I am handing you what the
18 reporter marked as Exhibit 13. Would you look
19 it over, please?

20 A Okay.

21 Q Just tell me when you are done
22 reviewing it.

23 A Okay.

24 Q Have you ever seen that document
25 before?

Page 83

83

2 A To be honest with you, there has been
3 so many forms back and forth with my lawyer.

4 The document that you presented to me
5 earlier, it all looks the same.

6 Q That's the caption.

7 Do you recall, sitting here today,
8 whether you have ever seen what has been marked
9 as Exhibit 13 before?

10 A I don't recall.

11 Q Did you ever take a document that had
12 questions and spaces on it and fill in the
13 answers?

14 MR. UMOH: Objection.

15 A To be honest with you, I know I have
16 given my lawyer information back and forth.

17 Q I understand that.

18 My question to you right now is, did
19 you ever sit down with a document that had
20 questions, and then blank spaces after the
21 questions, like this one does, like number 13
22 does, and actually write answers on it?

23 A I don't recall.

24 Q Or type answers?

25 MR. UMOH: Objection.

Page 84

84

1 A I don't recall.

2 MS. NORCROSS: Mark this as
3 Defendant's Exhibit 14.

4 (Whereupon the above referred
5 to document was marked, Defendant's
6 Exhibit A, for identification, as of
7 this date, by the reporter)

8 Q Take a look at what has been marked
9 as Defendant's Exhibit 14. It's got a lot of
10 pages, so take your time, and let me know when
11 you are finished reviewing it.

12 A Okay.

13 Q Have you ever seen this document
14 before?

15 A I can't recall, because this
16 basically looks like the one you just showed
17 me.

18 Q Take a look at the second page, just
19 to help you distinguish them.

20 A Okay.

21 Q Well, let's take it from the first
22 page.

23 Do you see on the front page of
24 Defendant's Exhibit 14, where it says
25

Page 85

85

1 Plaintiff's Responses to Defendant Plus Ones, et
2 cetera, Interrogatories?

3 A Okay.

4 Q And on number 13, it's just
5 interrogatories. Do you agree with me?

6 A Yes.

7 Q Please turn to page 4, defendant's
8 Exhibit 14, and look in particular right at the
9 top of the page, where it says interrogatory
10 number 1 --

11 A Yes.

12 Q -- and then the answer.

13 A Okay.

14 Q I guess I will read this for the
15 record. Tell me if I am reading this correctly,
16 please.

17 Interrogatory number one, please
18 identify each person other than your counsel in
19 this action who assisted in preparing your
20 answers to these interrogatories, and provide
21 the interrogatory numbers, each person assisting
22 in answers.

23 Identify all documents concerning the
24 information requested in this interrogatory.
25

22 (Pages 82 to 85)

Page 86

1 86
2 Answer, plaintiff received no help in
3 preparing her answers for these interrogatories.
4 Do you see that?
5 A Yes.
6 Q Have you seen that response to
7 interrogatory number one before today?
8 A I don't recall.
9 Q You don't remember; is that right?
10 Is that your testimony, you don't remember?
11 A Exactly.
12 Q If you would, please, go to the
13 second to last page of Exhibit 14.
14 And in particular, look at what we
15 call the jurat, which is the bottom half of the
16 page, starting State of New York County of
17 Kings.
18 Do you see that?
19 A Yes.
20 Q There is some typewriting and a line
21 with a handwritten signature.
22 Do you see that?
23 A Yes.
24 Q Is that your signature?
25 A I don't recall.

Page 87

1 87
2 Well, I was in New York at the time.
3 I was definitely in New York. It's just
4 paperwork to me, really.
5 Q Let me try to ask this question.
6 Do you have an independent
7 recollection of signing answers to
8 interrogatories, attesting to the accuracy and
9 truthfulness of those answers?
10 A I know I gave answers, but I don't
11 recall like when I gave them.
12 Is that answering your question?
13 Q No.
14 A Okay. Rephrase it please.
15 Q When did you leave to go to Guam?
16 A February 21.
17 Q And when did you commit to going to
18 Guam?
19 A You mean personally?
20 At first, I did not think it was a
21 legitimate company, and I thought they were
22 joking.
23 But when I saw the electronic ticket,
24 it was a week before February 22. It was about
25 the 14th, 15th.

Page 88

1 88
2 Q Focus, if you would, please, on the
3 notary stamp below the sworn and subscribe line.
4 Do you see where I am?
5 A Yes.
6 Q Who is that person, if you know?
7 A That's my lawyer.
8 Q Did you sit with your lawyer -- don't
9 tell me any content, because I am not trying to
10 get into privileged matters.
11 But what I want to know is, did you
12 sit with your lawyer and sign this document in
13 his presence?
14 A I have sat several times and signed
15 documents. I don't recall, specifically, but I
16 know I have signed stuff with him before.
17 Q What other things have you signed?
18 A Like some of the things you had in
19 the exhibits already, the thing that I submitted
20 to the E.E.O.C.
21 Q But that was somewhere else, you
22 testified, correct?
23 A I am sorry?
24 Q When you testified about signing the
25 E.E.O.C. charge, you said you took it somewhere

Page 89

1 89
2 in midtown, not your attorneys?
3 A That was like the charge.
4 I was talking about the E.E.O.C.
5 questionnaire that I first filled out on
6 April 5.
7 I did not have representation at all.
8 That was not even a thought on my mind.
9 Q Then when you completed the actual
10 charge, which we marked as Exhibit 6, the Notary
11 Public on that document is not one of your
12 attorneys, is it?
13 A Correct.
14 Q Then you said that you signed what we
15 have marked as Exhibit 11; but you signed this
16 in Guam, correct?
17 MR. UMOH: Objection.
18 MS. NORCROSS: This is the
19 affidavit.
20 MR. UMOH: I understand.
21 Q Is it correct, you signed Exhibit 11
22 while you were in Guam?
23 A Yes.
24 Q And the Notary Public who notarized
25 this document was not one of your attorneys,

23 (Pages 86 to 89)

<p style="text-align: right;">Page 90</p> <p>1 90</p> <p>2 correct?</p> <p>3 A Correct.</p> <p>4 Q Is it your testimony -- and you may</p> <p>5 have already said this. Is it your testimony</p> <p>6 you have no recollection of whether you signed</p> <p>7 this in the presence of your lawyer or not?</p> <p>8 A Correct.</p> <p>9 Q But you said there were other</p> <p>10 documents you signed in the presence of your</p> <p>11 attorney.</p> <p>12 Is that what you said, or did you not</p> <p>13 mean to say that?</p> <p>14 MR. UMOH: Objection to the</p> <p>15 form of the question.</p> <p>16 A I don't think I said that.</p> <p>17 Q Let me ask you this question.</p> <p>18 Is there any document that you can</p> <p>19 remember signing with your attorneys where your</p> <p>20 attorneys then notarized it?</p> <p>21 A I don't know.</p> <p>22 Q Going back to the answer to</p> <p>23 interrogatory number 1 on Exhibit 14 -- are you</p> <p>24 with me?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 92</p> <p>1 92</p> <p>2 other document now, except the one that's in</p> <p>3 front of you.</p> <p>4 In fact, not even this. Only look at</p> <p>5 Defendant's Exhibit 14. These are represented</p> <p>6 to be Plaintiff's Responses to Defendant's</p> <p>7 Interrogatories.</p> <p>8 A Yes.</p> <p>9 Q Plaintiff is you, correct?</p> <p>10 A Yes.</p> <p>11 Q And there is a signed -- would you</p> <p>12 agree with me, there is a copy of a signed,</p> <p>13 notarized, what we call a jurat statement, that</p> <p>14 says these are true and accurate answers?</p> <p>15 A Yes.</p> <p>16 Q And you signed this, correct?</p> <p>17 A I must have.</p> <p>18 Q But you have no memory of doing it?</p> <p>19 MR. UMOH: Objection. It's</p> <p>20 been asked and answered.</p> <p>21 MS. NORCROSS: It's been</p> <p>22 asked; it has not been answered.</p> <p>23 MR. UMOH: It's been asked and</p> <p>24 answered.</p> <p>25 A I don't recall.</p>
<p style="text-align: right;">Page 91</p> <p>1 91</p> <p>2 Q Plaintiff received no help in</p> <p>3 preparing her answers for these interrogatories.</p> <p>4 Does that mean you prepared the</p> <p>5 answers to these interrogatories?</p> <p>6 A To me, it means that these are my</p> <p>7 answers. I mean, if you want to play semantics,</p> <p>8 received no help, you know, someone typing it.</p> <p>9 Q I don't want to play semantics. I</p> <p>10 want to know what the truthful --</p> <p>11 A It means they are my answers,</p> <p>12 basically.</p> <p>13 Q Did you answer -- the interrogatory</p> <p>14 specifically says, other than your counsel.</p> <p>15 But the answers to these</p> <p>16 interrogatories, did you answer them?</p> <p>17 A I must have. I mean, if these were</p> <p>18 submitted, then I must have done this.</p> <p>19 Q Do you have any recollection of</p> <p>20 answering these interrogatories?</p> <p>21 A There is another court document that</p> <p>22 looked exactly like this with similar answers.</p> <p>23 Well, not similar answers.</p> <p>24 Q I understand it can be confusing.</p> <p>25 However, I am not talking about any</p>	<p style="text-align: right;">Page 93</p> <p>1 93</p> <p>2 But I know throughout this whole</p> <p>3 time, I have just been giving information after</p> <p>4 information.</p> <p>5 Q I understand what you are saying.</p> <p>6 My question, though, pertains</p> <p>7 specifically to this document.</p> <p>8 A Sure.</p> <p>9 Q And specifically to this document,</p> <p>10 because these are answers that are required to</p> <p>11 be, and were, according to the document anyway,</p> <p>12 not only answered by you, but answered by you</p> <p>13 under oath. That's why I am pressing you.</p> <p>14 My only question about them right now</p> <p>15 is, are these your answers?</p> <p>16 A When I look at interrogatory</p> <p>17 number 11, and it says please state your</p> <p>18 residential address, and I had a ton of</p> <p>19 addresses I had to give up.</p> <p>20 Q Did you just testify that you</p> <p>21 provided, in your words, a ton of addresses, in</p> <p>22 response to interrogatory number 11 on</p> <p>23 Exhibit 14?</p> <p>24 MR. UMOH: Objection.</p> <p>25 A That's a play on words. I did not</p>

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1 94
 2 mean a ton.
 3 In terms of my residential address,
 4 basically I lost my apartment. So after that, I
 5 was not staying at that particular address.
 6 Q Okay, I understand.
 7 Let me ask you this question.
 8 Approximately, if you cannot be specific, how
 9 many residential addresses have you had in the
 10 past ten years?
 11 A Well, see, it's kind of difficult to
 12 answer that question. Well, not difficult.
 13 It does not take into account when I
 14 was -- for instance, I wouldn't consider Guam my
 15 permanent address. Places where I have been on
 16 vacation. You see what I mean?
 17 Q Residential addresses means places
 18 where you live. They do not mean hotel rooms
 19 where you stay on vacation.
 20 MR. UMOH: Objection.
 21 MS. NORCROSS: I am simply
 22 responding to her expressed inability
 23 to define residential.
 24 Q My question is, in the past ten
 25 years, how many residential addresses have you

Page 95

2 95
 3 had, approximately, if you can't be specific?
 4 A Well, here's the thing.
 5 Are you talking about legal address,
 6 because where I stayed, or what was my legal
 7 address?
 8 Q Are they different in some
 9 instances?
 10 A I think so, because if you're staying
 11 over at someone's house for, let's say, a month,
 12 is that my legal address? You see what I am
 13 saying?
 14 Q Let's try this. Let's define a
 15 residential address as anyplace where you might
 16 receive mail.
 17 A Okay.
 18 Q In the past ten years, how many of
 19 those have you had?
 20 A I would say, if you're saying within
 21 the past two years --
 22 Q Ten.
 23 A Ten years, about two.
 24 No. Hold that. Hold on. It could
 25 be about three or four.
 Q There is going to be motion practice.

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1 96
 2 If your attorney has not explained
 3 that to you, you can talk to him directly.
 4 There is going to be motion practice
 5 about the deficiency of these answers to
 6 interrogatories.
 7 You can decide with your counsel
 8 whether you want to provide that and some of the
 9 other information that's requested. I am only
 10 concerned about the amount of time that it would
 11 take, given that last answer; so we will not
 12 continue on that interrogatory at this moment.
 13 A Sure.
 14 Q What, if anything, did you do to
 15 prepare for today's deposition?
 16 A Made sure I got enough sleep, and I
 17 got the earliest train.
 18 Q Where are you staying while you're
 19 here?
 20 A I am visiting my father.
 21 Q What state?
 22 A New Jersey.
 23 I have not seen him in a while.
 24 Q Did you do anything else to prepare
 25 for your deposition?

Page 97

1 97
 2 A Just making sure I knew the exact
 3 address and making sure I was not late.
 4 Q Did you meet with your attorneys to
 5 prepare?
 6 A I did not meet to prepare.
 7 Q Who is your attorney? Do you have
 8 one, or more than one?
 9 A Are you talking about a firm, or who
 10 is handling the specifics?
 11 Q I just want to know who you consider
 12 to be your attorney in this lawsuit.
 13 A The firm of Chide, Eze.
 14 Q Do you consider Mr. Eze your counsel,
 15 or Mr. Umoh?
 16 A I always considered it collaborative.
 17 Q Did you meet with any of your
 18 attorneys to prepare for today's deposition?
 19 A There was no preparing.
 20 Q So you did not meet with them to
 21 prepare for today's deposition?
 22 A Not to prepare.
 23 Q You arrived in New York on the 5th;
 24 is that right?
 25 A Yes.

25 (Pages 94 to 97)

Page 98

1 98
 2 Q Between the 5th and today, did you
 3 meet with your attorneys?
 4 Don't tell me substance. Just tell
 5 me yes or no.
 6 A Yes.
 7 Q When?
 8 A Saturday, August 9.
 9 Q And for how long did you meet with
 10 your attorneys on Saturday, August 9?
 11 A I know it was about at least a half
 12 hour.
 13 Q Was it more than an hour?
 14 A I was not checking my watch. I don't
 15 know whether I was in there for an hour.
 16 Q Was it more than two hours?
 17 A No.
 18 Q To prepare for your deposition, did
 19 you review any documents?
 20 A What I did, I looked at -- not with
 21 my lawyer, on my own, I looked at some of my own
 22 paperwork by myself. I wanted to make sure I
 23 was accurate with giving my answers, and
 24 familiar, because this has been going on for
 25 quite some time.

Page 99

2 99
 3 Q What papers did you look at?
 4 A The E.E.O.C. charge.
 5 Q Anything else?
 6 A No.
 7 I think the charge had the affidavit
 8 explaining the whole scenario from April 5 to
 9 June.
 10 Q The E.E.O.C. charge with the attached
 11 statement?
 12 A Yes.
 13 Q Is there anything else that you
 14 reviewed besides that?
 15 A Actually, I was jogging my memory to
 16 make sure I had an account basis of what
 17 happened with Jamie, just the verbal exchange
 18 and what happened, the discrimination that took
 19 place. I wanted to look at my statement, just
 20 to look at it again.
 21 Q In addition to that, did you review
 22 any other documents?
 23 A I don't think so.
 24 I can't think of any other. I don't
 25 remember if I did.
 Q When you met with your attorneys to

Page 100

1 100
 2 prepare for your deposition, did you look at any
 3 documents?
 4 MR. UMOH: Objection.
 5 A It was verbal.
 6 Q I am not permitted, and I am not
 7 trying to go into content of the discussion you
 8 had with your lawyers.
 9 A I just remember us talking.
 10 Q Please tell me in chronological
 11 order, to the best you can, where, if anywhere,
 12 you have been employed since June 16, 2006.
 13 A Since 2006?
 14 Q Yes, ma'am.
 15 A I have been employed at P.I.C.
 16 Resort. I have been employed at --
 17 well, I have a question. Independent
 18 contractor, or just an employee?
 19 Q We will split them up.
 20 As an employee, first.
 21 A P.I.C. Resort, Holiday Temp
 22 Services.
 23 I remember receiving unemployment,
 24 but I would have to look at my tax return to
 25 know all the other employers, because I

Page 101

1 101
 2 definitely got a W-2, so I have to look at my
 3 taxes.
 4 I know definitely Holiday Temp
 5 Services, P.I.C.
 6 In terms of employee, I don't
 7 remember what else, but it's on my taxes.
 8 Definitely employers, I can remember those, too.
 9 Q Do you have your tax returns for
 10 2006, 2007 -- 2006 and 2007?
 11 A I definitely filed them.
 12 I am still trying to get my
 13 accountant to give me a copy of 2006.
 14 Q Who is your accountant?
 15 A Steven Lauler.
 16 Q Where is Mr. Lauler located?
 17 A It's either Englewood or Hackensack,
 18 New Jersey.
 19 Q When you tried to get these documents
 20 from Mr. Lauler, how have you done that?
 21 A E-mail, and left phone messages.
 22 MS. NORCROSS: Counsel, those
 23 are also things that that should have
 24 been produced.
 25 Q I am going to ask you to search for

26 (Pages 98 to 101)

Page 102

1 102
 2 those and provide them to us.
 3 MR. UMOH: Take it under
 4 advisement.
 5 Q When was the last time you tried to
 6 contact Mr. Laufer to get your tax returns?
 7 A It had to be during my employment
 8 while I was in Guam.
 9 I know I did not file my taxes for
 10 2007 and 2006 until recently. I believe it was
 11 even after April 15 of this year. It could have
 12 been late spring, early summer.
 13 But I know I reached out to him. I
 14 sent him a couple of e-mails.
 15 He never responded in sending all my
 16 tax returns. I never got 2006.
 17 Q Did you get 2007?
 18 A I know I got part of it. I have to
 19 check my e-mail again.
 20 He was busy, or whatever.
 21 Maybe he was waiting for a payment.
 22 Q Was he waiting for a payment?
 23 A No, because I had paid him in
 24 advance.
 25 I submitted it close to -- I don't

Page 103

1 103
 2 remember when I was able to give him all of the
 3 information about my taxes, but I do know that
 4 when I submitted all the information to him, he
 5 said, Well, you will have to wait, because it's
 6 crunch time. He has a lot. Don't worry.
 7 He filed an extension for me.
 8 Q Where did you do work as an
 9 independent contractor since June of 2006?
 10 A I know definitely, Linblad
 11 Expeditions.
 12 Q Anywhere else?
 13 A I know that sticks out, because I got
 14 paid something substantial in that job. I mean,
 15 I know I could have temped, but I don't know if
 16 I -- I don't recall actually getting a temp
 17 assignment.
 18 Again, it's on my taxes.
 19 Q What work, if any, did you do for
 20 Holiday Temp Services?
 21 A They sent me out on a customer
 22 service job.
 23 Q Just one job?
 24 A Yes.
 25 Q Is there any reason why --

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1 104
 2 A Now I remember.
 3 What it was, I got an assignment at a
 4 company in Brooklyn, but then they had layoffs.
 5 They laid me off right after Christmas. So
 6 that's why I contacted Holiday Temp Services, to
 7 get another job.
 8 Q I am sorry.
 9 Who laid you off around Christmas?
 10 A Novel Box Company.
 11 Q Were you employed by Novel Box
 12 Company, or were you working for them as an
 13 independent contractor?
 14 A I am trying to remember if they took
 15 taxes out or not. I am not sure about that, but
 16 my taxes would have that information.
 17 I don't know if I signed a W-4 form
 18 or not, but it should be reflected in my taxes.
 19 I am sorry. I keep being
 20 repetitive.
 21 Q When did you work for Novel Box?
 22 A It was around Christmastime.
 23 Q Christmas of what year?
 24 A End of 2007 to the beginning of
 25 2008.

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1 105
 2 Q How long did you work for them?
 3 A It could not have been more than a
 4 few months, even if it was that.
 5 Q Was it full time or part time?
 6 A It was full time.
 7 Q How many hours a week?
 8 A I think it paid by the hour. It was
 9 a project that I was working on.
 10 Q So how did you get paid?
 11 A By check.
 12 Q Did you get paid a set fee for a
 13 project?
 14 A I am trying to think if I was billing
 15 them hours over that.
 16 I know it was not a set thing every
 17 week, because sometimes they would close the
 18 office.
 19 Q I don't understand. And we don't
 20 have any documents about this.
 21 Let me try to figure this out.
 22 A Okay.
 23 Q You worked for Novel Box the end of
 24 2007 to early 2008?
 25 A Yes.

27 (Pages 102 to 105)

Page 106

106

1 Q What did you do for them?

2 A They took me on as a graphic

3 designer.

4 Q And what did you do for them as a

5 graphic designer?

6 A I was editing their jewelry

7 catalogue.

8 Q Were you editing text or graphics?

9 A Both.

10 Q And what was your compensation

11 arrangement with them?

12 A I got paid weekly.

13 Q Did you get paid a set amount weekly,

14 or did it vary?

15 A It varied.

16 Q And what did it vary on?

17 A Whether the office was open or not.

18 Q Did you ever do work at home, or did

19 you do it all at the office?

20 A I worked at home, but I did not get

21 paid for working at home. I did it because I

22 wanted to --

23 Q So if the office was closed, is it

24 accurate you would not get paid, even if you

25

Page 107

107

2 worked at home while the office was closed; is

3 that correct?

4 A Yes, correct.

5 Q What kind of company is Novel Box?

6 A They probably moved to Jersey by now.

7 That was part of the reason they laid me off.

8 It's a -- you know, when you go to a

9 jewelry store, they are the ones that

10 manufacture the jewelry boxes. They manufacture

11 some in there warehouse and they actually buy

12 from manufacturers in China. They do a little

13 bit of both.

14 Q Do they buy the boxes and then put

15 designs on them?

16 A They do that, as well.

17 MS. NORCROSS: I have to take

18 a five-minute break.

19 (Discussion off the record)

20 MS. NORCROSS: Mark this as

21 Defendant's Exhibit 15.

22 (Whereupon the above referred

23 to document was marked, Defendant's

24 Exhibit 15, for identification, as of

25 this date, by the reporter)

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108

1 Q Miss Mann, please look at what the

2 reporter has marked as Exhibit 15. And just let

3 me know when you are finished reviewing it,

4 please?

5 A Okay.

6 Q Have you ever seen that document

7 before?

8 A I don't recall, but I know the

9 information, I have.

10 Q Just so I am clear, I am not asking

11 about the information. I want to know if you

12 have seen that document before.

13 A I don't recall.

14 Q Is there anything that would help you

15 remember?

16 A I can't think of anything at this

17 point that would help me remember.

18 Q You mentioned your e-mails several

19 times. Would your e-mails help you remember?

20 A Looking through some of the

21 information, I know that I have e-mailed some of

22 this information to my lawyer, yes.

23 Q My question is, are there e-mails

24 that would help you remember whether you have

25

Page 109

109

1 seen this document before?

2 A Not that I can recall, not

3 specifically. Not a specific e-mail, but I know

4 I had e-mailed this information to --

5 Q Again, I am not talking about the

6 information; I am talking about the document.

7 A There is no one specific e-mail that

8 could make me pinpoint this document.

9 Q Where were you physically located by

10 city, state, country, whatever, on June 16,

11 2008?

12 A I was in Guam.

13 Q If you had received this document on

14 or about June 16, would that have been -- would

15 that be reflected in an e-mail you got?

16 A There are a bunch of e-mails. I

17 don't know.

18 Q Look, we have limited time. So what

19 I am trying to do, I am asking you to try to

20 answer the questions I am asking.

21 My question is, if you had seen this

22 document before, would it have been e-mailed to

23 you, do you think?

24 A Possibly. I have to check my

25

28 (Pages 106 to 109)

Page 110

110

1 e-mails.
 2 Q You would check your e-mails?
 3 A Yes.
 4 Q I am going to ask you to do that.
 5 A Okay.
 6 MR. UMOH: Objection to the
 7 extent it calls for any communication
 8 between counsel and the witness.
 9 MS. NORCROSS: I want to know
 10 whether she saw the document before.
 11 Q Miss Mann, it is accurate, is it not,
 12 that at some point you became employed by Plus
 13 One Fitness?
 14 A Yes.
 15 Q When did you become employed by Plus
 16 One?
 17 A August 2002.
 18 Q And how did that come about?
 19 A I saw an ad in a local newspaper, and
 20 I answered it.
 21 Q And did you then have an interview?
 22 A Yes, I did.
 23 Q Do you remember who you interviewed
 24 with?
 25

Page 111

111

2 A I believe -- I am not sure of her
 3 last name. I believe it was the head massage
 4 therapy person at the time. I think her name
 5 was Christian, C-h-r-i-s-t-i-a-n.
 6 Q Was that a phone interview, or was
 7 that done in person?
 8 A In person.
 9 Q What position did you apply for?
 10 A Massage therapist.
 11 Q Where was that position located, do
 12 you remember?
 13 A In New Jersey.
 14 Q Do you remember where in
 15 New Jersey?
 16 A It started off at Plus One's Merrill
 17 Lynch's site.
 18 Q Which one? Which location?
 19 A I forget the street. It was in
 20 Jersey City.
 21 Q You said it started out there?
 22 A Yes.
 23 Q Where else were you assigned?
 24 A I did Goldman Sachs. I had a
 25 standard shift there.

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112

1 They sent me on various sites in
 2 New York City, like the New York Stock Exchange,
 3 several events over the course of those years.
 4 Q When you were a massage therapist for
 5 Plus One, was this a full-time or part-time
 6 position?
 7 A That was part time.
 8 Q And do you recall what your rate of
 9 pay was?
 10 A Starting out?
 11 Q Yes, ma'am.
 12 A No, I don't recall what it was
 13 starting out as, because I got paid a different
 14 rate, depending on what kind of job it was.
 15 The rate at Merrill Lynch was
 16 different from the rate at Goldman Sachs.
 17 When I did health expose, that was a
 18 different rate, as well.
 19 Q As a massage therapist in New Jersey,
 20 you were licensed; is that right?
 21 A No. At that time, in 2002, there
 22 were no -- there was not any licensing
 23 requirements in New Jersey. They had not passed
 24 legislation.
 25

Page 113

113

1 Q Did there come a time when you did
 2 become licensed as a massage therapist in
 3 New Jersey?
 4 A I am thinking, at the time, I don't
 5 know if I was grandfathered in. I don't know if
 6 they did past legislation where you have to have
 7 a license.
 8 I don't know if you have to register
 9 with the police now.
 10 Q Did you ever obtain a massage
 11 therapist license in New Jersey?
 12 A No.
 13 Q Did you ever obtain a massage
 14 therapist license in New York?
 15 A No.
 16 Q When you worked at Plus One as a
 17 massage therapist, it was during a period when
 18 you were not required to be licensed in
 19 New Jersey; is that correct?
 20 A Correct.
 21 Q Were you eligible, to the best of
 22 your knowledge, to obtain a massage therapist
 23 license in New York at any point in time?
 24 A Yes.
 25

29 (Pages 110 to 113)

Page 114

1 114
2 Q And did you ever obtain one?
3 A I was in the process of getting it.
4 Q Did you ever obtain one?
5 A No. Because the reason why --
6 Q I did not ask why, ma'am.
7 A Okay. I will just answer the
8 question.
9 Q Only, again, because we are so
10 constrained for time.
11 It's not that I am trying to be rude.
12 I am trying to make some effort to be
13 sufficient.
14 A Okay.
15 Q When you were employed as a massage
16 therapist at Plus One, did you ever earn, in any
17 given year, any one year, more than \$10,000 from
18 Plus One?
19 A From Plus One?
20 Q Yes.
21 A I would have to look at my tax
22 records.
23 Q Sitting here today, do you recall
24 whether you ever earned more than \$10,000 from
25 Plus One when you were a massage therapist?

Page 115

1 115
2 A Again, I would have to look at my tax
3 records to say yes or no.
4 MS. NORCROSS: Mark this as
5 Defendant's Exhibit 16.
6 (Whereupon the above referred
7 to document was marked, Defendant's
8 Exhibit 16, for identification, as of
9 this date, by the reporter)
10 Q Please review what the reporter has
11 marked as Defendant's Exhibit 16.
12 And when you are finished, please
13 tell me if you can identify this document.
14 A It looks like my application for
15 employment with Plus One.
16 Q On the second page of the document,
17 about midway through, do you see where it
18 says -- it begins -- it's a single-spaced
19 paragraph, I certify the facts contained, and it
20 goes on. Do you see that?
21 A Yes.
22 Q You see a signature below that
23 paragraph?
24 A Yes.
25 Q Is that your signature?

Page 116

1 116
2 A Yes.
3 Q Your name then was Rhonda Mann; is
4 that correct?
5 A Yes.
6 Q And that's what you signed it as,
7 correct?
8 A Yes.
9 Q You attended Howard University?
10 A Yes.
11 Q When?
12 A I attended from 1986 to 1990.
13 Q And did you graduate?
14 A Yes, I did.
15 Q And what was your degree?
16 A A bachelor of arts.
17 Q And with what major?
18 A Broadcast journalism.
19 Q Do you have a copy of your
20 certificate of graduation, diploma?
21 A It's in storage, yes.
22 Q That same storage place you were
23 talking about before?
24 A Yes.
25 Q If you know, what is Jordan Holistic

Page 117

1 117
2 Center?
3 A I am trying to remember if that was
4 the name of my website.
5 It was basically the name of how I
6 presented my free-lance massage holistic
7 counseling business.
8 Q Is that a business that you actually
9 had?
10 A Yes. I filed a sole proprietorship.
11 I don't remember what years, but I
12 know I definitely registered like a business.
13 But in terms of promotional material,
14 I know Jordan was in a lot of the promotional
15 material.
16 Q Did you actively do work for this
17 business that was called Jordan's Holistic
18 Center?
19 A Yes.
20 Q Over what period of time?
21 A It had to be while I was employed
22 with Plus One part time.
23 Q I am sorry. I don't understand your
24 answer.
25 First give me dates.

30 (Pages 114 to 117)

Page 118

1 118
 2 Between what period and what period
 3 did you actually perform work as Jordan's
 4 Holistic Center?
 5 A I don't remember what date or year I
 6 actually started calling it Jordan's Holistic
 7 Center.
 8 But I know as soon as I graduated
 9 from massage school, I did free-lance work as a
 10 massage therapist and holistic health
 11 counseling.
 12 Q When did you graduate massage
 13 school?
 14 A December 2002.
 15 Q Is it accurate, you did not do any
 16 work for Jordan's Holistic Center or as Jordan's
 17 Holistic Center before you graduated from
 18 massage school?
 19 MR. UMOH: Objection.
 20 A I don't know when I started using
 21 Jordan's. I don't know when I started using
 22 Jordan's Holistic Center.
 23 I do know, once I got into holistic
 24 health, I would counsel people; but I don't know
 25 when I actually started using Jordan's name.

Page 119

1 119
 2 Q Look again at Defendant's Exhibit 16.
 3 Where, if at anywhere, on this
 4 application does Jordan's Holistic Center
 5 appear?
 6 A It does not appear here at all.
 7 It would not have to be. On this
 8 sheet, it's for former employers, so there is a
 9 difference.
 10 Q You consider you did not have to
 11 identify Jordan's Holistic Center because you
 12 did not consider it an employer? Is that
 13 correct? Is that what you're telling me?
 14 A Yes.
 15 Q Did you do work through Jordan's
 16 Holistic Center during the time you were
 17 employed as a massage therapist at Plus One?
 18 A Yes, I did.
 19 Q Did you tell that to Plus One, or did
 20 you think you did not have to?
 21 MR. UMOH: Objection to the
 22 question.
 23 A Well, I can remember there was no
 24 signed exclusive contract.
 25 Q I am not looking for a reason or

Page 120

1 120
 2 rationale.
 3 All I am asking you is, did you tell
 4 them or did you not?
 5 A That I had like other jobs?
 6 Q No, ma'am.
 7 A Sorry.
 8 Q If this continues, I am going to
 9 start having the reporter reading the questions
 10 back.
 11 My question is, during the time you
 12 worked as a massage therapist for Plus One, did
 13 you tell Plus One you were also doing massage
 14 therapy for Jordan's Holistic Center?
 15 MR. UMOH: Objection.
 16 Q Do you need the question read back?
 17 A Sure.
 18 MS. NORCROSS: Read back the
 19 question.
 20 (Whereupon, the above referred
 21 to question was read back by
 22 the reporter.)
 23 THE WITNESS: I am trying to
 24 remember if I had specific
 25 conversations, but my co-workers and

Page 121

1 121
 2 my supervisor knew.
 3 MS. NORCROSS: Move to
 4 strike.
 5 Q My question is, did you tell
 6 anybody?
 7 A Yes, I told someone.
 8 Q Who did you tell?
 9 A It had to have been whoever was
 10 working at the Merrill Lynch site from 2002,
 11 because that was the first site I worked at, to
 12 2004.
 13 Q You put a question mark at the end.
 14 Are you not sure?
 15 A I am not sure how many times I told
 16 them.
 17 Q That's not my question.
 18 My question was, did you tell them.
 19 And then my question was, who did you
 20 tell? And that's what I am trying to figure
 21 out.
 22 A I don't remember their specific
 23 names, but it had to have been the people at the
 24 Merrill Lynch site.
 25 Q Who was your supervisor at the

31 (Pages 118 to 121)

Page 122

1 122

2 Merrill Lynch site?

3 A There were several.

4 Q Who were they?

5 A There was one woman named Claudia. I

6 don't recall her last name.

7 There was another gentleman named

8 Steve, another woman named Laura, another one

9 named Richard, Vanessa. I don't recall their

10 last names.

11 Q What was Claudia's title?

12 A I am assuming, general manager.

13 Q What was Steve's title?

14 A It was either assistant general

15 manager or manager on duty.

16 Q Manager on duty is not a title.

17 Do you know what his title was?

18 MR. UMOH: Objection.

19 Q I am correct, manager on duty is not

20 a title, am I not?

21 MR. UMOH: Objection.

22 A I don't know that distinction.

23 Q Manager on duty is a function that

24 one takes over from time to time; am I

25 correct?

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1 123

2 A I am not familiar with that.

3 Laura, I think her title was general

4 manager.

5 Q Richard, what was his title?

6 A Again, he could have been manager on

7 duty, acting.

8 You know what, Vanessa, I think she

9 was the assistant.

10 Q And which of these people, if any,

11 did you tell that you were performing massage

12 therapy duties outside of Plus One?

13 A It could have been --

14 Q If you don't know, please tell me you

15 don't know. The guessing will not help.

16 A I don't remember.

17 Q Can you sit here today and tell me a

18 single person that you recall telling you were

19 doing massage therapy outside of Plus One?

20 A Yes.

21 Q Who?

22 A Steven.

23 Q What is Steven's last name?

24 A I don't recall, but he was definitely

25 an employee of Plus One, so they should have it

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1 124

2 on file.

3 Q And is Steven one of the people whose

4 title you don't know?

5 A Yes.

6 If I recall, I believe he was

7 assistant general manager.

8 Q Tell me what he said on the topic of

9 you doing massage therapy outside of Plus One.

10 A I don't recall specifics.

11 Q Do you recall anything?

12 A I mean, I don't remember verbatim how

13 I said I was working somewhere.

14 Q Well, do you remember anything that

15 you said?

16 A There were so many conversations.

17 Q That's not my question.

18 My question is, do you recall --

19 MR. UMOH: Please don't

20 interrupt the witness.

21 MS. NORCROSS: Your witness is

22 not answering questions that I ask

23 her.

24 Q You need to answer the questions I

25 ask, as opposed to thinking out loud.

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1 125

2 A Okay.

3 MS. NORCROSS: Mark this as

4 Defendant's Exhibit 17.

5 (Whereupon the above referred

6 to document was marked, Defendant's

7 Exhibit A, for identification, as of

8 this date, by the reporter)

9 Q Miss Mann, take a look at what has

10 been marked as Exhibit 17.

11 And when you have had a chance to

12 look it over, tell me if you recognize it,

13 please.

14 A Okay. No, I don't recognize this,

15 because I don't have the full document.

16 Q If you don't recognize it, how is it

17 you know you don't have the full document?

18 A Because it looks incomplete.

19 At the bottom, it's 02.

20 Q The 02 is a Bates stamp number put on

21 for the purposes of this litigation.

22 A It looks like an incomplete document,

23 just looking at it.

24 Q Do you recognize it?

25 A No.

Page 126

1 126
 2 Q Is that a copy of your signature on
 3 the document?
 4 A Yes, it is.
 5 Q So you did sign this. That's your
 6 signature, correct?
 7 A Yes.
 8 Q Please go back to Exhibit 16.
 9 Other than Jordan's Holistic Center,
 10 did you list all of your employment prior to
 11 Plus One on page 2 at the top there, where it
 12 says former employers?
 13 A I believe so.
 14 Q Did you skip anybody?
 15 A That could be a possibility. There
 16 could be free-lance things I picked up on the
 17 side as independent contractor, but these were
 18 my major employers.
 19 Q What is Hoffman Entertainment?
 20 A It's a talent management firm.
 21 Q What did you do for them?
 22 A I was a tour coordinator and
 23 marketing assistant.
 24 Q What does that entail?
 25 A Handling travel for musicians on

Page 127

1 127
 2 domestic and promo tours.
 3 Q Is it basically a clerical job?
 4 A No.
 5 Q Did you record your proper, accurate
 6 salary at that job, at \$27,500?
 7 A I believe that was my starting
 8 salary, or ending. It was probably my ending.
 9 Q Did you have a new job when you left
 10 Hoffman Entertainment?
 11 A I sure did.
 12 Q What does that say?
 13 A Hervey and Company.
 14 Q What is Hoffman Entertainment's
 15 address?
 16 A I don't know their current address.
 17 Q What was their address when you
 18 worked for them in December '97 and December
 19 '98?
 20 A I believe it was West 55th Street in
 21 New York City.
 22 Q And to your knowledge, did they move
 23 from that address?
 24 A I believe so.
 25 Q Who was your immediate supervisor?

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1 128
 2 A Randy Hoffman.
 3 Q How many employees were there at that
 4 company, about?
 5 A Five or six.
 6 Q How did you come to be employed by
 7 Hervey and Company?
 8 A Through friends.
 9 Q Where were you living at the time
 10 that you worked for Hervey and Company?
 11 A New Jersey.
 12 Q Where in New Jersey?
 13 A Jersey City.
 14 Q Is it accurate, Hervey and Company
 15 was located in Chappaqua?
 16 A Yes.
 17 Q At the time you accepted the
 18 position, did you know how far it was between
 19 Jersey City and Chappaqua?
 20 A Yes.
 21 Q How did you get there?
 22 A Bus to Grand Central, and then the
 23 train from Grand Central Station, all the way to
 24 Chappaqua, Metro North.
 25 Q You worked there for six months?

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1 129
 2 A Yes.
 3 Q Were you asked to leave?
 4 A No.
 5 Q Did you have a position when you
 6 left?
 7 A I am not sure. I don't remember. I
 8 don't know which came first.
 9 Q And then you went to work for HBO; is
 10 that right?
 11 A Yes.
 12 Q Did you record your accurate salary
 13 at HBO on this application?
 14 A I believe that was my last salary.
 15 That's not what I came in at. I
 16 think that's when I left.
 17 Q Did you inflate your salary?
 18 A No. In fact, I may be off a few
 19 hundred.
 20 Q Why did you leave?
 21 A Career change.
 22 Q What does that mean?
 23 A I left the entertainment industry to
 24 go into holistic health and alternative
 25 health.

33 (Pages 126 to 129)

Page 130

1 130
 2 Q Focus, if you would, please, on the
 3 statement -- the paragraph right above your
 4 signature. Do you see that?
 5 A Yes.
 6 Q When you signed this, you understood
 7 if you falsified statements on this application,
 8 your employment could be terminated.
 9 You understood that?
 10 A Yes.
 11 Q How long did you work as a massage
 12 therapist at Plus One?
 13 A Up until the time I was terminated.
 14 Q Is it your testimony that you worked
 15 as a massage therapist when you were employed in
 16 New York?
 17 A I would still go to Goldman Sachs,
 18 which is in New Jersey, and do full body massage
 19 there.
 20 Q When did you do that?
 21 A Definitely in 2006.
 22 But I know when the whole thing
 23 started with the incident with Jamie, when that
 24 happened, it became stressful, and I told them I
 25 had to take a little time off, just to sort of

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1 131
 2 get my bearings.
 3 MR. UMOH: Objection. Counsel
 4 is interrupting.
 5 MS. NORCROSS: Counsel is not
 6 interrupting a thing.
 7 MR. UMOH: I want to state my
 8 objection for the record. Counsel
 9 keeps interrupting the witness from
 10 responding accurately to her
 11 statements.
 12 MS. NORCROSS: Counsel has not
 13 interrupted her a single time.
 14 Q Ma'am, I am going to show you what is
 15 marked as Exhibit 4, which I believe you
 16 identified as your job posting.
 17 A Yes.
 18 Q Is it accurate to state that you
 19 applied for a position as the receptionist in
 20 the Trump World Towers facility?
 21 A Yes.
 22 Q And when did you do that?
 23 A This says February 15, 2006.
 24 Q And the position you applied for was
 25 as a receptionist?

Page 132

1 132
 2 A Yes.
 3 Q It was not assistant general
 4 manager?
 5 A Correct.
 6 Q It was not as customer service
 7 manager, correct?
 8 A Correct.
 9 Q And it was not as an assistant to the
 10 general manager, correct?
 11 A Incorrect.
 12 I did have some duties that I was
 13 assisting Tom.
 14 Q But your title was receptionist,
 15 right?
 16 A Okay.
 17 Q Yes or no?
 18 A The title here, yes.
 19 Q The title of the position was
 20 receptionist?
 21 A Yes.
 22 Q The title was not front desk manager,
 23 correct?
 24 A The title here.
 25 But Tom said that's what I was

Page 133

1 133
 2 doing.
 3 Q I am talking about --
 4 A Yes, the title here on the paper, on
 5 the internal posting, says receptionist.
 6 Q And the title of the position was
 7 receptionist, correct?
 8 A Yes.
 9 Q Did you ever represent to anyone that
 10 your title was other than receptionist?
 11 A I know when I had sent out job
 12 applications, I reworded it so people could
 13 understand what I did on my resume.
 14 Q Was it your belief that a person
 15 looking at a resume would not understand what a
 16 receptionist did?
 17 A What it is, like in certain
 18 positions, there is a difference between if
 19 you're just a receptionist, and you have no
 20 other duties outside of answering the phone.
 21 Sometimes people assume you just like answer the
 22 phone.
 23 Even though sometimes some people are
 24 assistant, they are actually manager. I just
 25 think it's semantics.

34 (Pages 130 to 133)

Page 134

1 134
 2 Q To convey the reality of the
 3 position, did you, in fact, tell potential
 4 employers that you had a title different than
 5 the one you actually had?
 6 A I did not tell employers I had a
 7 title differently than what I had.
 8 On my resume, it's like with all my
 9 resumes. I have changed them so much to gear it
 10 to each potential employer so they would
 11 understand what I did.
 12 When I would go to interviews, they
 13 would ask me, what does this mean?
 14 Q Did you ever change your resume to
 15 show your job title at Plus One as being
 16 assistant general manager instead of
 17 receptionist?
 18 A I never recall representing myself as
 19 assistant general manager, assistant to.
 20 It must have been a typo or
 21 something. I don't remember.
 22 Q Did you ever represent on a resume
 23 that you were a customer service manager?
 24 A I don't remember.
 25 Q But it's possible?

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1 135
 2 A I sent out hundreds of resumes. I
 3 seriously don't recall.
 4 Q You said your undergraduate degree is
 5 in broadcast journalism?
 6 A No. I said my major was broadcast
 7 journalism, and I have a Bachelor of arts.
 8 Q On your resumes, how, if at all, did
 9 you represent that degree?
 10 A That I graduated from Howard
 11 University.
 12 Q Did you ever represent that your
 13 major was journalism?
 14 A Sometimes I abbreviated. Sometimes I
 15 put journalism. Sometimes I did not put my
 16 major on it. I put Bachelor of Arts. Sometimes
 17 I highlighted my minor.
 18 Whatever employer I was sending the
 19 resume, I put what I knew they were focusing
 20 on.
 21 Q Did you represent your Bachelor of
 22 Arts was in communications?
 23 A Yes.
 24 Q Did you ever represent that your
 25 Bachelor of Arts was in broadcast and

Page 136

1 136
 2 television?
 3 A Yes, same thing. Broadcast
 4 journalism is more specific.
 5 Q You changed your resume, depending
 6 who you were sending the resume to; is that
 7 accurate?
 8 A Yes. I tailored it to each potential
 9 employer.
 10 Q By tailoring, you include changing
 11 your job title; is that correct?
 12 MR. UMOH: Objection.
 13 A I changed the duties, I changed what
 14 I did.
 15 If I was going for a temp job, I
 16 would stress my administrative skills. Or if I
 17 was going for an art job, I would --
 18 Q You had a job title at Plus One.
 19 And all I am asking, and I think you
 20 have said yes, is you changed that job title on
 21 the resume, depending who you sent that resume
 22 to; is that correct?
 23 MR. UMOH: Objection.
 24 A I believe I changed the way I was
 25 explaining by job responsibilities and duties.

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1 137
 2 MS. NORCROSS: Mark this as
 3 Defendant's Exhibit 18.
 4 (Whereupon the above referred
 5 to document was marked, Defendant's
 6 Exhibit 18, for identification, as of
 7 this date, by the reporter)
 8 Q Please look over what the reporter
 9 has marked as Defendant's Exhibit 18.
 10 I know it's a little bit lengthy.
 11 Just let me know when you have had a chance to
 12 review it.
 13 A Okay. Okay.
 14 Q Have you had a chance to look it
 15 over?
 16 A Yes.
 17 Q Go to the third page of the packet.
 18 A Okay.
 19 Q This is from Jordan Mann.
 20 That's you, right?
 21 A Yes.
 22 Q And it's dated Monday, January 14,
 23 2008, 11:03 a.m.?
 24 A Yes.
 25 Q On the section -- on your resume, on

35 (Pages 134 to 137)

Page 138

1 138
 2 here, the first entry, employment 2002 to
 3 2006 -- do you see where I am?
 4 A Yes.
 5 Q What did you reflect as having been
 6 your job title at Plus One?
 7 A Well, actually on the letter, I did
 8 not reflect the job title. It was more I was
 9 explaining to people my job responsibilities,
 10 and I felt assistant to general manager was more
 11 accurate in terms of the duties I did at Plus
 12 One.
 13 Q The title reflected here for your
 14 Plus One employment is, assistant to general
 15 manager; is that correct? Is that what it
 16 says?
 17 A It's not a title. It's a description
 18 of what I did.
 19 Q On this resume, you said your job at
 20 Plus One was assistant to the general manager?
 21 A Yes.
 22 Q Go back two more pages?
 23 A Okay.
 24 Q Do you see where it says 6-22-2008,
 25 9:17 p.m.

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1 139
 2 A Yes.
 3 Q On this one, the job title you used
 4 for Plus One employment was Customer Service
 5 Manager, correct?
 6 A Yes, Customer Service Manager.
 7 Q Go back one page.
 8 Just for the record, these appear to
 9 be the dates when they were printed about by
 10 counsel, 6-22-2008, 7:33 p.m.
 11 Are you on that page?
 12 A Yes.
 13 Q That page contains a portion of your
 14 resume?
 15 A Yes.
 16 Q What title did you use for your Plus
 17 One job there?
 18 A I used the description of what I did,
 19 front desk manager.
 20 Q Front desk manager, correct?
 21 A I used the description because I knew
 22 who I was sending this to, they would
 23 understand, just gearing towards what they would
 24 look for.
 25 Q Go to the next page in the same

Page 140

1 140
 2 package.
 3 A Yes.
 4 Q what job title did you use on this
 5 resume?
 6 MR. UMOH: Objection.
 7 Q This says subject, receptionist
 8 position, date, Wednesday, January 30, 2008,
 9 6:22 p.m.
 10 A I used the description of
 11 receptionist, because I knew they were looking
 12 to hire a receptionist.
 13 Q I see.
 14 The move to the position as the
 15 receptionist in the Trump facility is one you
 16 initiated, right?
 17 A Yes.
 18 Q Okay, why?
 19 A Health benefits.
 20 That was a major concern. I knew if
 21 I had a full-time job, I would get health
 22 benefits.
 23 Q You wanted to make the move to become
 24 full time; is that correct?
 25 A For health benefits, and plus I

Page 141

1 141
 2 knew -- well, I felt it would help my
 3 application, along with having Plus One sign off
 4 on my New York massage license.
 5 Q How does Plus One sign off on a --
 6 A Well, because I did not go to school
 7 in New York, and I was already a professional,
 8 certified, working in New Jersey, I could be
 9 grandfathered into the New York program.
 10 Plus One had to submit, sign off on a
 11 letter of recommendation and show proof that I
 12 had worked all those years as a massage
 13 therapist and had clients. I had to show I had
 14 worked as a massage therapist during those
 15 years, on my application.
 16 I had to have someone other than
 17 myself sign off on that. I had to have a
 18 reference.
 19 Q Were you not required to take certain
 20 courses to obtain a New York State massage
 21 license?
 22 A If you have not been a working
 23 professional massage therapist, there is a
 24 different protocol.
 25 But when your coming from another

36 (Pages 138 to 141)

Page 142

1 142
 2 state, and you're moving, there are certain
 3 allowances you can bypass without having
 4 specific courses.
 5 Q But you still need to take some of
 6 the courses, correct?
 7 A Or if you have not been a
 8 professional massage therapist before sending
 9 your application in.
 10 That's only true -- well, from my
 11 understanding, true for students who had just
 12 graduated, and they have no professional
 13 experience.
 14 Q Now you have said already you were
 15 not licensed in New Jersey?
 16 A Yes. Plus One hired me while I was
 17 still in school. Everyone knew I was still in
 18 school and did not graduate.
 19 Q You did not graduate?
 20 A Yes.
 21 There was no legislation enacted. In
 22 New Jersey, you can work as a massage therapist
 23 without being certified or anything.
 24 Q But you were enrolled in a course; is
 25 that right?

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1 143
 2 A Correct. Yes, full time.
 3 Q Do I understand, you did not graduate
 4 from that course; is that correct?
 5 A Incorrect.
 6 I graduated in the summer of 2002.
 7 Q You meant you did not graduate before
 8 you started working for Plus One?
 9 A Correct.
 10 Q What, if anything, were you told
 11 about working at the Trump facility before you
 12 took the position?
 13 A I know I was definitely told the
 14 salary.
 15 Q Okay.
 16 A And that upon taking that position, I
 17 had to be on call at Goldman Sachs and Merrill
 18 Lynch and other sites.
 19 Something about the hours, they said
 20 I could not hold a constant shift somewhere,
 21 some legality or something.
 22 In essence, I can only be on call as
 23 a massage therapist in New Jersey.
 24 Q You had a full-time position as a
 25 receptionist at Trump; is that right?

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1 144
 2 A Right.
 3 Q Were you told about the grooming
 4 standards? Were you told what you were supposed
 5 to wear, behave, anything like that, in
 6 preparation for going to work for the Trump
 7 Towers?
 8 A Could you repeat the question?
 9 MS. NORCROSS: Read back the
 10 question.
 11 (Whereupon, the above referred
 12 to question was read back by
 13 the reporter.)
 14 THE WITNESS: I was told that
 15 I definitely had to wear a uniform.
 16 I was told that I definitely had to
 17 wear a name tag. I was told
 18 definitely, when clients came through
 19 the door, I had to stand up and greet
 20 them.
 21 Q Anything else you remember?
 22 A Are you saying, was I informed of
 23 grooming standards before Jamie or post Jamie?
 24 Q I am asking you a general question.
 25 I want to know what you were told

Page 145

1 145
 2 about, before you went to the Trump facility. I
 3 want to know what you were told about what you
 4 needed to do, what standards might apply at that
 5 facility.
 6 A Those were like the main points,
 7 right there. And that I had to do the morning,
 8 opening up shift, that -- to fill in for Tom
 9 when he was not there, accept equipment, and so
 10 forth. Those were the major things.
 11 Q What kind of facility is the Trump
 12 World Towers?
 13 A Small fitness center, a yoga room and
 14 a small pool.
 15 Q How would you describe the facility
 16 itself, the building itself, not just the
 17 fitness facility?
 18 A It was quite stuffy, because it was
 19 in the basement. A lot of the equipment, the
 20 clients, the residents, would constantly
 21 complain the machines were not working.
 22 Q The Trump World Towers is a
 23 residential building, correct?
 24 A I believe so.
 25 Q It's a residential facility,

37 (Pages 142 to 145)

Page 146

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1 correct?
 2 A Yes.
 3 Q A very expensive residential
 4 facility, wouldn't that also be correct?
 5 A Yes.
 6 Q With residents who are, let's say,
 7 not to get political -- celebrities; would that
 8 be correct?
 9 A I have seen a couple of
 10 celebrities.
 11 Q In your experience working at Plus
 12 One, do different facilities have different
 13 requirements?
 14 A Yes.
 15 Q The way in which a Plus One employee
 16 needs to dress, for example, is different,
 17 depending upon the facility where you're
 18 working; would that not be correct?
 19 A Yes.
 20 Q If you're working at the Goldman
 21 Sachs facility, you might have to dress
 22 differently than if you were working at Merrill
 23 Lynch, right?
 24 A Yes. But there are certain
 25

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147

1 guidelines that have to be followed across the
 2 board.
 3 Q Plus One's business is to operate
 4 fitness centers in buildings owned and operated
 5 by other companies, correct?
 6 A Correct.
 7 Q And those other buildings and
 8 companies have their own rules and requirements,
 9 correct?
 10 A Yes.
 11 Q The Trump requirements might be
 12 different than Goldman Sachs, right?
 13 A Yes. And they might be different
 14 from the Waldorf Astoria, correct.
 15 A Yes.
 16 MS. NORCROSS: Mark this as
 17 Defendant's Exhibit 19.
 18 (Whereupon the above referred
 19 to document was marked, Defendant's
 20 Exhibit 19, for identification, as of
 21 this date, by the reporter)
 22 Q Take a look at Defendant's
 23 Exhibit 19?
 24 A Sure.
 25

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1 Q And identify it for me, if you can,
 2 okay?
 3 A I don't remember if this is Trump or
 4 if this is just Plus One.
 5 Q Have you had a chance to review the
 6 document?
 7 A Yes.
 8 Q Have you seen it before?
 9 A Yes.
 10 Q This is a grooming standard that
 11 applied at either Plus One or Trump, or both; is
 12 that accurate?
 13 A It could be.
 14 Q Is this a grooming standard that you
 15 consider applied to you during the time you
 16 worked for Plus One at the Trump facility?
 17 A This one, particularly?
 18 Q Yes, ma'am.
 19 A I can't say.
 20 If I can recall correctly, I did not
 21 see this until after I was employed at Trump.
 22 Q Who put the circle around the
 23 sentence that says, long hair must be pulled
 24 back, et cetera?
 25

Page 149

149

1 A Good question. I don't remember.
 2 Q Didn't you do that?
 3 MR. UMOH: Objection.
 4 A The whole thing was, I looked at the
 5 asterisk. And I don't do an asterisk like that,
 6 so I don't know who actually circled that.
 7 MS. NORCROSS: Mark this as
 8 defendants Exhibit 20.
 9 (Whereupon the above referred
 10 to document was marked, Defendant's
 11 Exhibit 20, for identification, as of
 12 this date, by the reporter)
 13 Q Take a look at what Sandy has marked
 14 as Defendant's Exhibit 20.
 15 A Yes.
 16 Q Do you recognize the document?
 17 A Yes.
 18 Q What is it?
 19 A This is a couple of pages printed out
 20 from the Plus One website.
 21 Q Okay. And who printed them out from
 22 the Plus One website?
 23 A I don't recall.
 24 I know this was an example that I
 25

38 (Pages 146 to 149)

Page 150

1 150
 2 used in terms of how I thought I was being
 3 discriminated against.
 4 Q Whose printing is that on the top
 5 there?
 6 A That looks like my handwriting.
 7 Q On the second page, is that also your
 8 handwriting?
 9 A Correct.
 10 Q Does that help you to remember
 11 whether you printed out these two pages from the
 12 Plus One website?
 13 A I must have.
 14 I am sure I must have printed it out
 15 for human resources.
 16 Q Did you know Bonnie Parsells?
 17 A No, I did not know her.
 18 Q Did you know where she worked?
 19 A No, I did not.
 20 Q Did she work at Trump?
 21 A No, she did not.
 22 Q And what about Joan Hatfield? Did
 23 you know her?
 24 A No, I did not.
 25 Q Did she work at Trump?

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1 151
 2 A Not when I was there.
 3 Q So she worked someplace else, right,
 4 as far as you know?
 5 A Yes.
 6 Q Now the example of hair on face,
 7 which is what you wrote at the top here, are you
 8 referring to Bonnie Parsells' bangs?
 9 A Yes.
 10 Q The example of hair on face for Joan
 11 Hatfield, are you also referring to her bangs?
 12 A Yes.
 13 MS. NORCROSS: Mark this as
 14 Defendant's Exhibit 21.
 15 (Whereupon the above referred
 16 to document was marked, Defendant's
 17 Exhibit 21, for identification, as of
 18 this date, by the reporter)
 19 Q Please take a look at what has been
 20 marked as Exhibit 21.
 21 And when you have had a chance to
 22 review it, let me know if you can identify it
 23 for me.
 24 A Okay. This was the document that
 25 Jamie produced after he insulted me about my

Page 152

1 152
 2 hair.
 3 Q Do you recognize this document?
 4 A Yes, I do.
 5 Q Can you tell me what it is?
 6 A It is the Trump work staff apparel,
 7 uniforms.
 8 Q Did you understand Trump had certain
 9 apparel and uniform requirements specific to its
 10 facility?
 11 MR. DERSCHOWITZ: Note my
 12 objection.
 13 A Are you talking about this specific
 14 document?
 15 Q No, anything.
 16 Did you know Trump had its own
 17 requirements?
 18 A No.
 19 Q Did you know if Trump had its own
 20 appearance standards?
 21 A I found out after Jamie insulted me
 22 about my hair. That's when I found out.
 23 That was the first time I saw this
 24 document.
 25 MS. NORCROSS: I am going to

Page 153

1 153
 2 move to strike.
 3 Q I am asking you about standards,
 4 okay?
 5 A Okay.
 6 Q Did you understand that there were
 7 particular standards relating to appearance or
 8 grooming that pertained specifically to the
 9 Trump World Towers condominium complex?
 10 MR. UMOH: Objection.
 11 A Not until after April 6 of 2006.
 12 Q Were you aware of any requirements
 13 that applied to you as a Plus One employee,
 14 working in the Trump World Towers, pertaining to
 15 how you dealt with customers or clients or
 16 residents or the people that you serviced?
 17 MR. UMOH: Objection.
 18 A There was a specific greeting.
 19 But yes, I was aware how I was to
 20 greet the clients.
 21 Q Were you aware of requirements
 22 regarding how you dealt with clients that might
 23 be difficult?
 24 A Nothing specific.
 25 Anything that went along with basic

39 (Pages 150 to 153)